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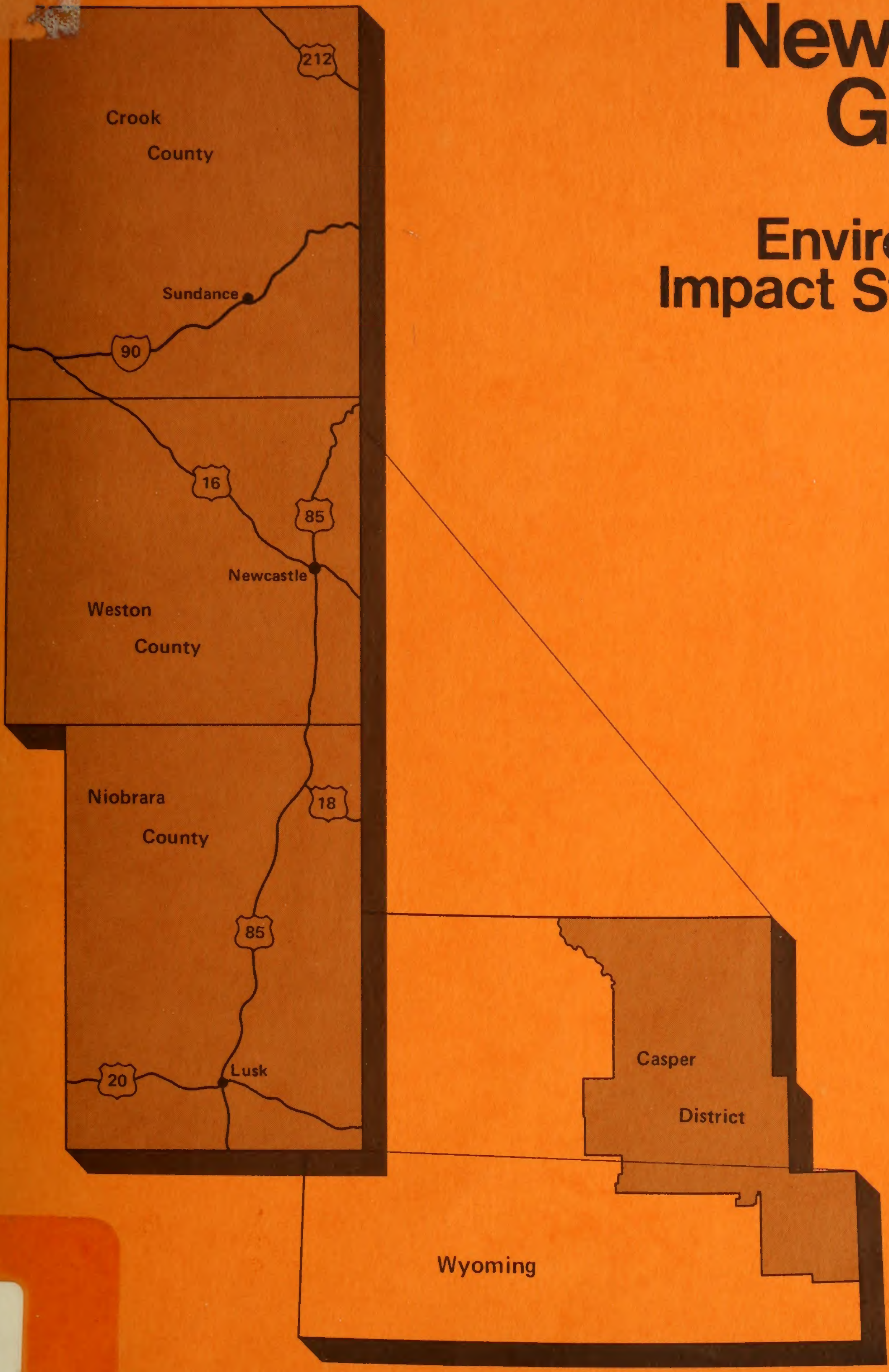

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
State Office
P. O. Box 1828
Cheyenne, Wyoming 82001

IN REPLY
REFER TO:
1792 (934)

MAR 16 1983

Dear Reader:

Enclosed for your information is the final Newcastle Grazing Enviromental Impact statement (FEIS). It has been revised in response to comments received on the Draft EIS.

The Bureau of Land Management's preferred alternative is the range improvement alternative. This allows present levels and seasons of livestock use on 282,000 acres of public land as well as allowing the development of new grazing management facilities and systems. New project development will improve livestock distribution patterns. The no action, or continuation of present management alternative is also analyzed in detail. Two other alternatives were considered but not analyzed in detail. The reasons for this are described.

No decisions will be made until 30 days of the FEIS Notice of Availability has been published in the Federal Register. All comments on the DEIS and FEIS will be considered in the decisionmaking process. We extend our thanks to those individuals and organizations who provided suggestions and comments throughout the EIS process. Your help has been invaluable in the preparation of these documents which will assist us to more effectively manage the public lands.

Sincerely yours,

Maxwell T. Lieurance

Maxwell T. Lieurance
State Director

Enclosure

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FINAL

NEWCASTLE GRAZING ENVIRONMENTAL IMPACT STATEMENT

Prepared By:

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

CASPER DISTRICT

STATE DIRECTOR

WYOMING STATE OFFICE

1983

SUMMARY

Five alternatives were considered during the preparation of this document but only two were analyzed in detail.The three considered, but not analyzed in detail were No Grazing, Maximize Livestock Forage Production, and Emphasize Wildlife and Watershed Resources. These were found to be not reasonable or responsive to the scoping concerns. The two analyzed were No Action (continuation of present management) and a Range Improvement alternative.

Although no significant issues were raised during the scoping process for this Impact (EIS), the following concerns were expressed by the public or surfaced during the preparation of the land use plan. These concerns formed the basis for the alternatives and impacts analyzed in this EIS.

Public Concerns: The BLM was not being aggressive enough in implementing range improvement projects.

Rangeland Problems: Distribution of livestock grazing patterns could be improved.

Opportunities: There are some opportunities for improvement (or maintenance) of range condition.

The analysis indicated that, even though the area is generally in good condition, the addition of fencing and new water sources for livestock and wildlife would result in better distribution of grazing under the "Range Improvement" alternative than would be possible under the "No Action" alternative. The better distribution paterns would in turn allow range conditions to improve.

No significant impacts created by or related to the grazing program in the Newcastle Resource Area were identified.

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CHAPTER 1

PURPOSE AND NEED

OVERVIEW OF RESOURCE AREA

This document analyzes livestock grazing on about 282,000 acres of public land in the Wyoming portion of the Newcastle Resource Area (NRA). The location is shown on the front cover. The EIS complies with the 1975 judgement in the court action of the Natural Resources Defense Council (NRDC) versus the Secretary of the Interior, which directed that EISs be prepared.

The NRS area is unique compared to most Resource Areas in the Bureau. The majority of the Bureau's past grazing EISs were written on areas covering large blocks of public lands, usually in excess of a million acres. These statements (EISs) often identified multiple resource opportunities, conflicts, and problems on public lands. In most cases, BLM could address these concerns through their own management plans.

In contrast, the NRA has less than 300,000 acres of widely scattered and isolated blocks of public lands. This is less than six percent of the EIS area which encompasses more than 5 million acres. Two hundred and fourty seven of the 312 ranch units contain less than 1,000 acres of public land. These public lands are quite productive and are generally in a good range condition. In many cases rangeland management is better addressed through cooperative plans with SCS or by private initiative rather than through BLM management plans.

Public lands within a typical ranch unit can be characterized as small fragmented, isolated tracts (40 to 80 acres). A typical ranch is 5,000 to 10,000 acres in size. Only one ranch has a pasture containing 4,000 acres of blocked public land.

No resource conflicts were identified during the development were opportunities identified for improvement (or maintenance) of range condition, as well as opportunities for increasing forage production. Hinderances limiting BLM's management capabilities are the scattered land pattern of public lands within the high percentage of privately owned lands, as well as a lack of serious resource problems.

The principal limiting factor, as the result of the above described management situation, is the lack of a positive economic return on public investments. In essence the cost of intensive grazing management would be high compared to the limited benefits to public lands, in many cases. In many instances, investments on public lands would return more benefits to the adjacent private lands than to the public lands, if such opportunities do exist. This limits management opportunities as well as reasonable management alternatives.

GOALS AND OBJECTIVES

The primary land use plan objective and the overall need of the grazing management program in the NRA is to maintain or improve ecological range condition in a "good" class, or better. During the preparation of the MFP, which was completed in early 1982, no conflicts between grazing and other resources were identified. No public land was found to be in poor range condition. This was confirmed after the analysis of the No Action Alternative in this document.

Although no significant issues were raised during the scoping process for this EIS, the following concerns were expressed by the public or surfaced during the preparation of the land use plan. These concerns formed the basis for the alternatives and impacts analyzed in this EIS.

Public Concerns: The BLM was not being aggressive enough in implementing range improvement projects.

Rangeland Problems: Distribution of livestock grazing patterns could be improved.

Opportunities: There are some opportunities for improvement (or maintenance) of range condition.

Management Framework Plan (land use plan) (MFP) grazing-related decisions dealt with weed control and animal damage control; however,they are not a part of this EIS analysis. A districtwide environmental assessment (EA) has been prepared for noxious weed control and is available for review. Animal damage control plans and associated environmental assessments have also been completed and are available for review.

Guidance for grazing administration on the public lands is contained in Title 43, Code of Federal Regulations Subpart 4100, the BLM-

Grazing Management Policy (BLM Instruction Memorandum No. WO-82-292), and the MFP. Copies of the instruction memo and the MFP summary brochure are available upon request to the Newcastle Area Manager, P.O. Box 757, Newcastle WY, 82701.

All of the grazing allotments in the NRA were placed in "Maintenance" (M) or "Custodial" (C) categories (see maps) according to an analysis of the existing situation. Factors used in evaluating the allotments include present range condition and management, resource potential/conflicts/ controversy, and the potential for positive economic return on investments. A complete description of these factors (Categorization Criteria) are in the appendix.

Objectives for the allotment categories in the NRA are as follows:

Maintenance: To maintain or improve the existing satisfactory or better resource condition and productivity.

Custodial: To manage the land in a manner that will prevent deterioration of current resource condition.

BLM's Grazing Management Policy recognized as "Improve" (I) category for allotments that are currently in an unsatisfactory/condition. However, there were no "I" allotments identified in the NRA.

Management actions by allotment category are described below.

Management actions by allotment category are decribed below.

1. Maintenance Category Allotments

Monitoring would be carried out to detect undesirable changes and resource conditions or conflicts. The results would serve as a basis for management decisions prior to development of Allotment Management Plans (AMPs) or other plans geared toward resource improvements. AMPs are activity plans for allotments or groups of allotments. They include locations and designs of range projects, and constraints for range manage-ment practices.

A monitoring study plan would be developed which would address the collection of data on the following:

—ecological range condition and trends,

—wildlife studies,

—actual livestock use,

—forage utilization, and

—climate.

Consultation and coordination with the operators would be a part of the plan. Monitoring study procedures are described in BLM Draft Manual 4430 and in Instruction Memo WY-82-330. Copies of the latter are available from the resource area on request.

The priority for monitoring would be identified in the monitoring study plan. It probably would be directed first toward allotments in fair condition and then toward allotments in good and excellent condition (see Table 1).

2. Custodial Category Allotment

Monitoring would be carried out as described in the "M" category discussion. However, the "C" allotments would be generally lower in intensity and priority than the "M" allotments. Monitoring would most often occur in response to possible resource conflicts (e.g. wildlife and watershed) identified by BLM or the public.

SCOPING

Scoping for the EIS began during preparation of the MFP. In addition to public involvement during actual preparation of the plan, a summary brochure containing proposed land use decisions was made available for comment. During the comment period meetings were held in each of the three Wyoming counties involved. The purpose of the meetings was to further explain the proposed decisions and invite public input.

Scoping continued with the publication of a Notice of Intent (*Federal Register* August 25, 1982), which invited the identification of suggested issues. Every grazing lessee in the NRA was contacted by mail, and some were also contacted in person during the proposed categorization of allotments. The draft EIS was sent to other governmental agencies and the general public for review. Comments received that addressed the adequacy of the EIS and/or merits of the alternatives are responded to in this document.

CHAPTER 2

ALTERNATIVES

INTRODUCTION (ALTERNATIVES CONSIDERED)

This Chapter describes alternatives to grazing management in the NRA. The analysis of the environmental effects of the alternatives is documented in Chapter 4. Five alternatives were analyzed in the preparation of this document and only two were brought forward and analyzed in more detail. The other three were found to be not reasonable or not within the range of alternatives to be considered by the decisionmaker.

The No Grazing alternative was analyzed but not developed in detail because:

—it would not have resolved the grazing issues in the NRA;

—it would not have provided a reasonable basis from which impacts of the other alternatives could be analyzed or compared;

—it had not been identified during the scoping process;

—it would not be reasonable because of the extensive fencing required to implement no grazing on public land in this area characterized by an extremely scattered land pattern.

The maximized livestock forage production alternative was analyzed but not developed in detail because:

—The public (including livestock operators) have not expressed a need for this alternative;

—There is limited opportunity to increase forage production because most of the range is in satisfactory or better condition. Any opportunities for an increase in forage production which may exist will be determined after monitoring studies are completed.

The alternative which emphasized wildlife and watershed was not analyzed in detail because:

—There were no identified conflicts between livestock and wildlife range use identified during the preparation of the MFP necessitating alternative management schemes.

—The habitat is currently supporting big game levels at or above the Wyoming Game and Fish Department's strategic plan objective populations. They have not expressed a need for such an alternative (see Appendix 3).

—The rangeland is in satisfactory or better condition.

The No Action Alternative and the Range Improvement Alternative were developed and analyzed in detail in this document. The No Action Alternative is the continuation of present management as defined in the Code of Federal Regulations, 43 CFR 1601.5-5. The Range Improvement Alternative optimizes livestock forage production and use when looking at the full range of alternatives.

NO ACTION ALTERNATIVE

This alternative would continue existing management systems and levels as described in Chapter 3 (see Tables 1 and 2). Generally, that would include continuing to issue grazing leases at existing levels and seasons of use and to develop no range improvements. In effect, current livestock grazing use would not be altered by BLM management actions, including improvements, such as fencing new pastures.

RANGE IMPROVEMENT ALTERNATIVE (PREFERRED ALTERNATIVE)

This alternative incorporates the management described in the "No Action" alternative and the implementation of grazing management plans and monitoring studies. Construction of range improvement projects would not occur until the need for them is identified.

The priorities for the implementation of this alternative is based upon the Bureaus' Selective Management Program described in Instruction Memorandum WO-82-292. Essentially, BLM has assigned management priorities among allotments, or group of allotments containing public land. These priorities were based upon the identification of BLM grazing allotments sharing similar:

—resource characteristics,

—management needs, and

—resource and economic potential for improvement.

This alternative allows for continuation of grazing lease issuance by the BLM pending the results of monitoring. It also allows for specific management actions for each category of allotments.

Range improvements would be allowed on public land. These improvements would be constructed and funded by BLM, other agencies, or livestock operators. Existing range improvements would be maintained by the users.

BLM would develop AMP's with the cooperation of the livestock operator, using management practices described in BLM Manual 4112 and data from monitoring studies. The AMP would include methods to improve range conditions such as improving livestock distribution and forage utilization. The AMPs could also identify opportunities to improve other resource values (i.e. wildlife). The NRA is expected to have a maximum of 15 AMPs within the next 15 years.

The Soil Conservation Service (Great Plains Program) and the Agricultural Stabilization and Conservation Service (Agricultural Conservation Program), U.S. Department of Agriculture, administer federal cost sharing programs. With this alternative, public lands would be incorporated into the plans and improvements of these agencies.

Livestock operators can implement range improvement on public land through permits or cooperative agreement with the BLM.

The facilities on public lands would be primarily directed to achieving better livestock distribution. They would be built at approximately the following rates:

	Annual (for next 10 years)	Cost per Improvement
Livestock reservoirs	3	$5,000
Livestock tanks	2	500
Pipelines for water	1.5 miles	4,000/mile
Pasture fencing	1.5 miles	3,200/mile

These facilities would be constructed in accordance with BLM manuals and policy; for example, fences in antelope areas would be designed so as not to impede the animals' movement. The BLM standard operating procedures are summarized in Appendix 2.

Neither vegetative manipulation nor seeding is anticipated on public lands in the NRA because it appears that the cost would be greater than the economic benefits.

Proposed improvements must be consistent with the MFP, and all range improvement require site-specific compliance with the National Environmental Policy Act. BLM would prepare the environmental assessment or, in the case of another agency's proposal, be a cooperating agency.

Although range improvements would be carried out in the same way as those for "M" allotments, those for "C" allotments would be funded primarily by other agency cost sharing or by private investment. There are no specific range improvement proposals for these allotments at this time. A NEPA document would be prepared for any future proposals.

SUMMARY OF IMPACTS

No Action Alternative

Some water facilities are located off public land when a better location for livestock and wildlife distribution patterns, and cost effectiveness would be on public land.

Range Improvement Alternative

Better distribution of livestock and wildlife forage utilization would result on pubic land.

Forage production may increase by 15% within 25 years.

New water sources would provide a small amount of additional waterfowl habitat.

CHAPTER 3

AFFECTED ENVIRONMENT

In accord with the CEQ regulations, the decription of the affected environment focuses on those resources that would be significantly impacted by the alternatives.

The NRA encompasses more than five million acres. Of this total, BLM manages about 294,000 surface acres, or less than 6 percent. These lands are scattered and in relatively small tracts (see maps).

There are 312 ranch operators that graze livestock on the public land. The ranchers generally have a low percentage of public land in their total operation. Many have 5,000-acre to 10,000-acre ranches with scattered 40 to 80 acre tracts of public land. Only 65 operators have leases containing more than 1,000 acres of public land.

Approximately 282,000 acres of public land and 48,000 animal unit months (AUM's) are leased for livestock grazing (see Tables 1 and 2). An AUM equals about 800 pounds of dry forage. Carrying capacities for livestock average about 6 acres/AUM.

Lease periods vary in the NRA; however, ten year grazing leases are being issued. As on-the-ground inventories of ranch units obtain information on kinds and numbers of livestock and seasons of use, more ten-year leases will be issued. Exceptions to this procedure will be made when private leased land is involved. In such cases, the term of the federal lease will match the private lease term.

"Cow-calf" operations are the norm in the NRA but there are some sheep and yearling cattle operations. Generally, the season-of-use varies from year-long to 5-6 months (mid May through October) in all counties.

Rangeland conditions are generally good (see Table 1 and 2). Condition trends are static or improving. Livestock forage utilization is basically uniform, but situations exist where livestock distribution, and thus utilization could be improved. This situation exists where livestock waters are insufficient, especially in rough terrain.

Range condition, as described in the Missouri River Basin Studies (Belle Fourche River Basin, 1957; White and Niobrara River Basin, 1951; Little Missouri River Basin, 1954; Upper Cheyenne River Basin, 1957) are shown on Tables 1 and 2. This data shows the rangelands to be generally in good condition. Recent evaluations indicate the trend in range conditions to be static or improving. This conclusion was based upon professional observations, consultation with SCS personnel and local ranchers, use of current SCS range site guides and Phase I Watershed Studies. The Phase I Watershed Studies gathered basic data for soils, vegetation and erosion on about 87,000 acres in Niobrara County in 1978.

The predominant vegetation type in the NRA is sagebrush grasslands. However, the vegetation ranges from sparse saltbrush and grass on shaley soils of the plains to timbered areas of juniper and pine occurring on ridges and in rougher areas. Precipitation within the resource area ranges from 11 to 17 inches annually. Most of the precipitation falls in the spring.

Public lands in the NRA provide habitat for big game, small game, nongame birds, mammals, reptiles, amphibians and invertebrates. Habitat types range from densely timbered areas to grasslands and riparian areas. They provide food, cover, water, and adequate space to allow for proper maintenance of the life cycle during all or part of the year.

Presently there are no significant conflicts between livestock and big game. The habitat supports numbers of big game which are at or above the objective levels of the Wyoming Game and Fish Department for this area (see Appendix 3). There are no wild horses or burros in the resource area.

The resources of the NRA are described more fully in the MFP Unit Resource Analysis, which is available for review at the NRA office.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

Cummulative effects of the alternatives (Chapter 2) are described in this chapter. Site-specific impacts of individual management actions and projects will be analyzed in subsequent activity plan/EA's.

Analysis of the alternatives indicated that the following resource components would not be significantly affected by grazing management in the NRA:geology and minerals, soils, climate, visual resources, transportation, and socioeconomic conditions. There also would be no significant effect on the following mandatory items:flood plains, wetlands, prime and unique farmlands, wilderness, areas of critical environmental concern, water quality, prime or sole source of drinking water, cultural and historical values, air quality, and wild or scenic rivers. Threatened and endangered species were considered and the analysis indicated they would not be affected. The requirements of the Endangered Species Act of 1973 will be addressed when site-specific impacts of individual actions are assessed.

No unavoidable adverse impacts or irreversible and irretrievable impacts were identified.

NO ACTION ALTERNATIVE

The following rangeland problems exist and would continue under this alternative.

—The planning and development of range projects on private lands (approximately 150 to date) currently by-pass public lands, and there is no NEPA documentation which analyzes the effects of these developments. For example, water facilities must be located entirely off public land, or additional lengths of pipe are required to go around public land. The conditions that result from this constraint will alter the grazing pattern on public land and range improvement locations may not be the best sites for cost effectiveness or for resource values. The effect is higher costs and less efficient developments.

—Livestock and wildlife congregate around existing water sources which results in more extensive use of the areas. This impact occurs on both public and private land and in only a small percentage of a pasture. The use does not however, create significant impacts to water quality, soil or vegetation. Other areas of public land are underused resulting in less than optimum overall productivity of the herbivores utilizing the range.

RANGE IMPROVEMENT ALTERNATIVE

The following impacts can be expected from implementation of grazing management plans and the associated construction of the proposed range improvements (water facilities and fencing).

—Better distribution of livestock and forage utilization on the public and private lands. The effect would occur in both the short term (up to 25 years) and the long term (more than 25 years). It is highly probable that this will occur.

—It is estimated that within 25 years of implementation, vegetative production would increase by as much as 15 percent. The increase, which is based on production potential described in the SCS range technical guides, could be allocated to livestock, wildlife and/or watershed. The probability of this increase is very likely to occur. The effect would be long-term.

—New water sources will develop better distribution of wildlife which are now concentrating on private lands where water sources have been developed. The ultimate effect is to reduce the economic loss to individual ranches while maintaining wildlife populations. The probability is estimated to be 100 percent because the forage currently exists—the limiting factor is water.

—New water sources will provide a small amount of additional habitat for waterfowl (approximately 1.5 acres per year).

CONSULTATION AND COORDINATION

Every grazing lessee was contacted by mail; there also were some personal contacts.

Soil Conservation Service (Crook, Weston, and Niobrara counties) provided estimates of potential range improvements and participated in the analysis.

U.S. Fish and Wildlife Service, Billings, Montana, participated in the review of a no-affect deter—mination biological assessment in accordance with Section 7 of the Endangered Species Act of 1973. Wyoming Game and Fish Department was consulted for strategic big game levels.

The results from extensive MFP scoping were utilized in this process.

This document and the Draft EIS was sent to 312 grazing lessees and over 100 agencies and organizations including the following:

- —Federal agencies with jurisdiction or interest
- —State agencies with jurisdiction or interest
- —Heads of county governments in the three counties
- —Heads of major city governments in the counties
- —County libraries
- —District Advisory Council
- —Groups, agencies, organizations and individuals who have expressed an interest in the area or requested information.

A complete listing is maintained in the Newcastle Resource Area office and is available for review.

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LIST OF PREPARERS

(Interdisciplinary Team)

GLEN BESSINGER. Chief Planning and Environmental Assistance, Casper District — 5 years Bureau of Reclamation, 5 years Bureau of Land Management.

BRUCE DAUGHTON. District Range Conservationist — 20 years, Bureau of Land Management

GARY LEBSACK. Newcastle Resource Area Wildlife Biologist — 8 years, Bureau of Land Management

GLEN NEBEKER. Casper District Environmental Coordinator (Team Leader) — 3 years, Bureau of Land Management

DON PETERSON. Newcastle Resource Area Range Conservationist — 19 years, Bureau of Land Management

DARRELL SHORT. Newcastle Resource Area Manager — 20 years, Bureau of Land Management

DON WHYDE. Casper District Planning Coordinator — 12 years, Bureau of Land Management

TABLE 1

TABLE 1

M CATEGORY ALLOTMENTS

Grazing Lease #	Acres Public Land Leased	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Range Condition Acres (Public Land) Excellent	Good	Fair	Season of Use
8295	7,268	1,643	19,062	20,333	2,590	27	2.95	160	6,428	1,040	year-round
8385	4,737	1,920	9,465	16,122	437	29	10.84	680	3,937	120	year-round
8239	2,968	--	7,800	10,768	623	27.6	4.76	-	-	2,968	year-round
8080	2,658	--	11,202	13,860	464	19.2	5.72	-	1,898	760	year-round
8193	3,920	1,440	30,550	35,910	766	12.8	5.30	440	2,760	720	summer-fall
8303	5,075	--	12,640	17,714	949	28.6	5.35	-	4,715	360	year-round
8045	10,240	2,880	13,840	26,962	1,446	38.0	6.17	-	8,620	1,620	summer-fall
8342	1,026	--	3,929	4,955	187	21	5.49	-	106	920	year-round
8048	4,172	640	4,920	9,732	642	43	6.50	-	3,352	820	year-round
8046	5,328	1,520	9,280	16,128	724	33	7.36	-	3,488	1,840	year-round
8242	1,318	--	4,871	6,191	200	21	6.59	-	1,198	120	year-round
8261	7,204	2,124	20,090	29,418	1,062	24.5	6.78	-	5,724	1,480	year-round
8050	5,522	1,286	30,801	37,609	1,047	14.7	5.27	-	4,322	1,200	year-round
8013	4,552	1,920	7,760	14,232	908	32.0	4.57	-	80	4,472	year-round
8310	3,254	1,680	9,360	14,294	696	22.8	4.7	-	2,054	1,200	year-round
8320	4,228	2,201	23,948	30,376	904	13.9	4.68	-	160	4,060	year-round
8394	5,300	4,437	26,520	36,257	806	14.6	6.0	360	3,780	1,160	year-round
8095	735	43	4,800	5,578	129	13.0	5.60	-	735	-	year-round
8220	3,100	160	6,040	9,300	360	33.0	8.61	-	2,860	240	year-round
8403	720	--	360	1,080	148	67.0	4.86	-	720	-	summer-fall
8068	1,332	2,206	6,900	10,438	199	12.7	10.00	-	1,320	-	year-round
8057	3,091	--	6,754	9,845	455	31.4	7.0	-	3,091	-	year-round
8158	1,320	640	3,940	5,900	220	22.4	6.0	-	1,040	280	year-round
8167	8,756	21,758	20,000	50,514	1,352	17.3	6.48	-	8,756	-	year-round
8186	3,265	1,280	9,508	14,053	427	23.2	7.7	-	3,265	-	year-round
8421	4,793	--	7,643	12,436	660	38.5	7.26	-	4,793	-	year-round
8279	2,804	960	13,768	17,532	519	16.0	5.5	-	2,084	720	year-round
8381	5,551	1,280	13,360	20,191	842	27.5	6.9	-	5,551	-	year-round
8351	5,276	1,680	19,747	26,703	785	19.8	5.9	-	2,441	2,835	year-round
8399	4,216	1,360	6,640	12,216	615	34.5	6.85	-	3,576	640	year-round
8293	574	--	1,797	2,371	87	11.6	6.60	-	574	-	year-round
8296	760	--	4,840	5,600	142	14.0	5.30	160	560	40	year-round

TABLE 1--CONTINUED

Grazing Lease #	Acres Public Land Leased	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Range Condition Acres (Public Land) Excellent	Good	Fair	Season of Use
8012	3,584	2,240	10,538	16,362	590	22.0	6.00	80	2,624	880	year-round
8010	1,800	640	9,080	11,520	323	15.6	5,58	-	1,800	-	year-round
8145	2,728	640	1,840	5,208	275	52.4	9.92	-	2,728	-	year-round
8361	7,060	2,880	25,880	35,820	879	19.7	8.03	80	6,060	920	year-round
8093	11,962	3,783	22,340	38,085	2,018	31.4	5.4	160	10,242	1,560	year-round
8001	2,772	640	4,571	7,983	394	35	7.03	-	1,812	960	year-round
8221	3,380	1,280	41,738	46,398	483	7.3	6.75	-	3,220	160	summer-fall
8181	6,695	1,290	12,675	20,660	1,197	32.4	5.7	-	6,335	360	year-round
8258	1,476	--	3,440	4,916	182	30	8.11	-	1,156	320	year-round
8097	1,439	--	1,960	3,399	184	42	7.82	-	1,439	-	summer-fall
8084	1,286	--	1,578	2,864	138	44.9	9.32	-	-	1,286	summer-fall
8341	1,606	--	5,250	6,856	214	23.4	7.50	-	1,202	404	year-round
8172	6,164	--	18,084	28,528	1,190	36.6	5.69	-	6,164	-	summer-fall
8031	5,592	6,081	36,069	47,742	1,025	11.7	5.06	-	5,072	520	summer-fall
8081	3,355	640	2,640	6,635	619	50.2	5.42	-	1,995	1,360	summer
8265	1,440	--	3,721	5,761	178	27.9	8.09	-	1,440	-	year-round
8269	1,363	--	2,602	3,965	384	34	3.50	-	1,363	-	year-round
8382	560	--	2,040	2,600	150	22	3.70	-	560	-	year-round
8304	1,226	--	4,867	6,093	254	20.1	4.83	-	200	1,026	year-round

TABLE 2

C CATEGORY ALLOTMENTS1/

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8004	30	--	668	698	4	4	7.50	summer-fall
8005	275	--	3,742	4,017	46	7	5.98	year-round
8007	317	--	1,777	2,094	59	15	5.37	year-round
8014	560	--	2,406	2,966	90	19	6.22	year-round
8015	179	--	6,932	7,111	36	3	4.97	summer-fall
8017	959	2,300	25,841	29,100	209	3	4.59	year-round
8018	2,834	3,160	24,006	30,000	464	9	6.11	year-round
8025	279	--	3,080	3,359	31	8	9	year-round
8028	235	320	837	1,392	26	16.9	9.05	summer-fall
8030	80	--	960	1,040	10	8	8	summer-fall
8036	360	--	2,560	2,920	56	12	6.43	year-round
8039	560	640	2,980	4,180	124	13	4.52	year-round
8042	40	640	2,280	2,960	12	1.4	3.33	year-round
8056	40	640	12,000	12,680	2	0.1	40.00	summer-fall
8051	280	--	3,840	4,120	36	7	7.78	year-round
8059	66	--	983	1,049	12	6.3	5.55	summer-fall
8060	798	--	3,194	3,992	138	20	5.78	summer-fall
8061	148	440	2,627	3,215	14	5	10.57	summer-fall
8064	1,226	960	8,520	10,706	234	11	5.24	year-round
8065	39	--	2,100	2,139	7	2	5.57	winter
8066	119	640	1,804	2,563	20	5	5.95	year-round
8071	42	--	640	682	9	6	4.67	summer-fall
8072	95	--	3,600	3,695	27	2.5	3.50	year-round
8075	1,190	640	3,735	5,565	140	21	8.51	year-round
8076	50	--	810	860	3	6	16.67	year-round
8077	37	--	2,400	2,437	6	2	6.17	year-round
8082	474	640	16,637	17,751	36	2.7	4.1	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8085	680	800	3,720	5,200	85	13	8	year-round
8086	520	--	2,960	3,480	92	15	5.65	year-round
8089	40	--	3,957	4,150	21	4.7	10.3	year-round
8091	197	--	2,680	2,877	44	8.2	4.48	year-round
8092	23	--	2,800	2,823	5	1	4.60	summer-fall
8098	80	640	6,720	7,440	12	1	6.67	summer-fall
8105	80	--	480	560	12	14	6.67	year-round
8106	42	--	860	902	9	5	4.67	summer
8107	194	--	1,420	1,614	47	12	4.3	year-round
8111	278	423	7,520	8,221	55	3	7.69	year-round
8113	160	--	5,327	5,487	20	2.9	7.6	year-round
8114	240	--	2,680	2,920	38	8	6.32	year-round
8117	80	320	6,800	7,200	17	1	4.71	summer-fall
8118	160	360	3,278	3,798	27	4	5.93	year-round
8119	199	--	2,520	2,719	36	7	5.53	year-round
8122	240	--	3,440	3,680	36	7	6.69	year-round
8123	120	640	4,560	5,320	23	2	5.22	year-round
8134	280	--	921	1,201	42	23	6.67	year-round
8137	89	--	1,400	1,489	9	6	9.89	year-round
8138	320	--	3,240	3,560	40	9	8.00	year-round
8140	679	640	3,800	5,119	60	13	11.32	year-round
8146	170	640	2,600	3,410	20	3	8.50	year-round
8147	720	--	2,200	2,920	134	25	5.37	year-round
8148	120	900	10,658	11,678	21	1	5.71	spring-summer-fall
8149	120	--	960	1,080	20	11	6.00	year-round
8152	25	--	1,900	1,925	7	1	3.71	fall
8153	274	--	1,120	1,394	56	20	4.89	summer-fall

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8157	80	--	960	1,040	13	8	6.15	year-round
8159	358	--	9,160	9,518	48	4	7.46	year-round
8160	80	--	5,000	5,080	23	2	3.48	year-round
8164	720	--	2,520	3,240	75	22	9.61	year-round
8175	1,200	1,920	14,520	17,640	218	7	5.51	year-round
8177	80	--	1,600	1,680	10	5	8.10	summer-fall
8180	120	--	2,760	2,880	19	4.1	6.32	year-round
8182	118	640	6,000	6,758	24	1	4.96	year-round
8183	72	--	3,579	3,651	20	2	3.60	year-round
8184	341	--	2,615	2,956	73	12	4.67	year-round
8189	80	800	2,880	3,760	12	2	6.67	summer-fall
8190	400	640	4,320	5,360	49	7	8.16	year-round
8191	337	4,080	880	5,297	54	6	6.24	year-round
8198	80	--	1,696	1,776	24	5	3.33	year-round
8206	201	--	3,560	3,761	30	5	6.70	year-round
8208	84	--	1,804	1,888	30	4	2.80	year-round
8209	280	2,000	18,000	20,280	49	1	5.71	year-round
8215	80	160	3,280	3,520	24	2	3.33	summer-fall
8217	320	--	4,120	4,440	80	7	4	year-round
8218	40	120	1,760	1,920	14	2	2.86	summer-fall
8224	80	280	5,980	6,340	22	1	3.64	summer-fall
8225	80	320	2,594	2,994	18	3	4.44	year-round
8227	239	6,900	11,100	18,239	46	1	5.22	year-round
8230	160	--	3,111	3,271	36	5	4.44	year-round
8231	2,325	1,600	17,720	21,645	408	11	5.70	year-round
8233	160	--	1,061	1,221	20	13	8	year-round
8235	200	--	1,000	1,200	17	17	11.82	summer
8238	280	800	2,573	3,653	41	8	6.83	year-round
8240	80	--	800	880	22	9	3.64	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8243	39	--	915	954	4	4	10	summer-fall
8244	76	--	1,920	1,996	10	4	7.60	summer-fall
8246	237	--	1,500	1,737	41	14	5.80	summer-fall
8255	160	--	2,807	2,967	16	5	10	year-round
8262	194	480	2,480	3,154	38	6	5.13	year-round
8263	40	--	1,816	1,856	4	2	10	year-round
8270	200	--	1,240	1,440	44	14	4.57	year-round
8271	119	--	6,520	6,639	24	2	4.96	year-round
8273	97	--	1,291	1,388	9	7	10.89	year-round
8274	198	--	4,200	4,398	32	5	6.19	year-round
8282	40	--	1,111	1,151	6	3	6.67	summer
8283	40	--	760	800	5	5	8	summer-fall
8300	40	205	421	666	12	6	3.33	year-round
8302	40	640	1,380	2,060	8	2	5	year-round
8306	316	600	9,000	9,916	52	3	6.08	summer-fall
8315	240	--	8,062	8,302	53	3	4.53	year-round
8316	400	120	1,619	2,139	110	19	3.64	spring-fall
8326	1,055	--	5,920	6,975	183	15	5.77	year-round
8328	160	--	1,120	1,280	20	13	8	year-round
8330	80	--	6,184	6,264	12	1	6.67	year-round
8337	112	--	3,280	3,392	20	3	5.60	year-round
8338	29	--	1,300	1,329	4	2	7.25	year-round
8343	80	--	1,960	2,040	20	4	4	year-round
8345	44	--	631	675	4	7	11	summer
8347	211	640	1,677	2,528	49	8	4.31	year-round
8349	161	--	640	801	16	20	10.06	year-round
8355	40	--	2,000	2,040	5	2	8	year-round
8357	392	--	4,320	4,712	20	8	19.60	year-round
8358	160	--	3,690	3,850	24	4	6.67	year-round
8363	40	--	1,920	1,960	7	2	5.71	summer-fall

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8367	120	--	960	1,080	25	11	4.80	year-round
8374	158	--	800	958	35	16	4.51	summer-fall
8375	40	--	1,520	1,560	12	2.6	3.33	year-round
8376	360	--	4,000	4,360	62	1	5.85	year-round
8378	400	640	3,680	4,720	44	8	9.09	year-round
8379	40	--	2,800	2,840	7	1	5.71	year-round
8380	80	--	2,553	2,633	15	3	5.33	year-round
8383	40	--	1,000	1,040	12	4	3.33	year-round
8391	39	--	1,080	1,119	7	3	5.57	year-round
8393	464	--	1,944	2,408	48	19	9.69	year-round
8397	422	--	3,400	3,822	37	11	11.41	year-round
8400	400	--	4,340	4,740	61	8.4	7.28	year-round
8402	360	--	1,000	1,360	71	26	5.07	year-round
8406	40	--	3,323	3,363	2	1.1	20	year-round
8408	80	720	880	1,680	20	4.8	4	summer
8409	40	--	1,120	1,160	10	3.6	4	year-round
8410	80	--	2,560	2,640	12	3	6.67	year-round
8418	40	640	680	1,360	12	2.9	3.33	summer
8420	80	--	321	401	14	19.9	5.72	summer-fall
8423	79	--	640	719	14	11	5.67	summer-fall
8392	40	--	6,008	6,048	5	1	8	year-round
8006	471	640	1,300	2,411	52	19.5	9	year-round
8009	320	--	3,080	3,400	104	.9	3	summer-fall
8020	320	--	2,943	3,263	93	9.8	3.3	year-round
8023	679	--	944	1,623	68	38	10	summer-fall
8041	293	--	920	1,213	35	24	8.30	summer-fall
8044	520	--	11,640	12,160	74	4.3	6.1	summer-fall

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8052	1,009	1,010	1,958	3,977	59	25	17.10	year-round
8053	839	639	2,940	4,418	175	19	4.79	year-round
8054	681	681	3,540	4,902	99	14	6.80	summer-fall
8073	1,454	--	1,600	3,054	101	47.6	14.39	year-round
8096	280	120	4,880	5,280	57	5.3	4.91	year-round
8100	320	--	2,480	2,800	72	11	4.40	year-round
8126	40	--	1,200	1,240	8	.3	5	summer-fall
8150	80	--	1,520	1,600	12	.5	6.60	fall
8151	53	--	1,420	1,473	5	.4	10.60	summer-fall
8154	281	--	1,280	1,561	36	18	7.80	year-round
8156	80	--	--	--	18	--	4.40	summer-fall
8166	558	--	1,640	2,198	38	25	14.60	year-round
8176	375	--	159	554	37	70	10.10	year-round
8188	1,000	1,320	6,000	8,320	152	12	6.50	year-round
8194	605	--	960	1,565	33	39	18.30	year-round
8195	160	--	800	960	17	17	9.40	year-round
8202	80	1,922	760	2,762	12	.3	6.60	year-round
8232	142	720	746	1,608	14.2	.9	10.10	summer-fall
8236	240	1,320	8,920	10,480	38	.2	6.30	year-round
8241	241	--	640	881	14	27	17.20	winter
8245	40	--	160	200	4	20	10	year-round
8247	120	640	3,786	4,546	6	.3	20	summer-fall
8248	80	600	6,042	6,722	2	.1	40	fall
8249	40	280	1,400	1,720	2	.2	20	summer
8256	632	--	2,240	2,872	163	21	3.80	year-round
8260	902	--	2,280	3,182	243	28	3.70	year-round
8264	40	520	1,320	1,880	3	.2	13.30	summer
8266	40	--	1,612	1,652	5	.2	8	summer-fall
8267	40	--	1,640	1,680	6	.2	6.60	summer-fall
8268	286	--	2,120	2,406	35	12	8.17	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8276	40	--	400	440	6	.9	6.60	fall
8289	1,175	--	12,920	14,095	283	8.3	4.4	year-round
8294	158	--	176	334	14	47	11.20	summer-fall
8299	801	--	16,676	17,477	163	.5	4.90	year-round
8309	2,138	--	1,396	3,534	124	61	17.25	summer-fall
8313	969	--	11,910	12,878	89	.8	10.80	summer-fall
8314	80	--	3,191	3,271	16	.2	5	year-round
8317	347	--	4,190	4,537	46	.8	7.50	year-round
8319	40	--	640	680	12	.6	3.30	year-round
8344	160	--	640	800	20	20	8	year-round
8346	80	--	4,424	4,504	5	.2	16	year-round
8348	340	--	1,560	1,900	60	18	5.60	year-round
8359	350	640	14,400	15,390	46	.2	7.62	year-round
8364	40	--	1,000	1,040	5	.4	8	year-round
8365	160	280	1,400	1,840	14	.9	11.40	year-round
8366	40	--	1,369	1,409	4	.3	10	year-round
8389	481	520	2,240	3,241	73	15	6.50	year-round
8407	320	3,954	9,880	14,154	23	.2	13.90	year-round
8411	644	--	1,741	2,385	51	27	12.60	year-round
8414	470	160	2,460	3,090	44	15.2	10.5	summer-fall
8415	520	--	3,200	3,720	98	13.9	5.30	year-round
8416	241	--	1,960	2,201	73	10.9	3.30	summer-fall-winter
8002	1,400	1,280	9,960	12,640	334	11.4	4.20	summer-fall-winter
8003	1,118	--	6,522	7,640	204	14.6	5.48	year-round
8008	80	640	1,592	2,240	12	3.6	6.83	fall-winter
8024	140	640	6,500	7,280	16	1.9	5.4	summer-fall
8335	720	640	6,020	7,380	179	9.8	4.13	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8038	120	--	2,560	2,680	26	4.5	4.62	year-round
8062	884	--	1,280	2,164	138	40.7	6.41	year-round
8074	320	640	8,080	9,040	44	3.5	7.27	summer-fall
8101	795	1,080	2,320	4,195	153	18.9	5.19	year-round
8109	80	--	2,280	2,360	13	3.4	6.15	summer-fall
8112	1,216	640	12,113	13,969	192	8.7	6.34	year-round
8120	292	--	1,280	1,572	59	18.6	4.95	year-round
8121	120	--	760	880	30	13.6	4	year-round
8124	120	640	2,400	3,160	18	3.8	6.67	year-round
8127	521	--	1,284	1,810	104	28.8	5.01	year-round
8130	280	640	5,720	6,640	64	4.2	4.38	year-round
8129	445	--	7,265	7,710	73	5.8	6.26	year-round
8139	468	--	1,280	1,748	58	26.8	8.08	year-round
8141	120	--	1,280	1,400	26	8.6	4.62	year-round
8143	200	--	2,060	2,260	44	8.8	4.55	summer-fall
8161	40	--	1,760	1,800	10	2.2	4	year-round
8162	280	800	8,000	9,080	47	3.1	5.96	year-round
8163	40	640	6,320	7,000	11	.6	3.64	summer-fall
8170	760	2,080	6,640	9,480	187	8	4.06	year-round
8171	120	--	320	440	24	27.3	5	year-round
8173	40	2,320	4,040	6,400	8	.6	5	summer
8185	2,372	640	8,960	11,972	513	19.8	4.65	fall-winter
8192	80	--	1,528	1,608	4	5	20	summer-fall
8196	120	640	1,160	1,920	20	6.3	6	year-round
8199	240	--	1,760	2,000	60	12	4	year-round
8200	920	--	3,060	3,980	206	23.1	4.47	year-round
8201	464	--	4,065	4,529	93	10.2	4.99	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8204	44	--	320	364	9	12.3	4.97	year-round
8205	360	--	3,280	3,640	82	9.9	4.7	year-round
8207	323	640	5,000	5,963	65	5.4	4.98	year-round
8226	80	639	1,835	2,554	20	3.1	4	summer-fall-winter
8234	876	640	5,940	7,456	215	11.7	4.07	year-round
8251	1,841	--	46,288	48,129	296	4.0	6.65	year-round
8253	560	640	4,480	5,680	90	9.9	6.80	year-round
8254	715	3,840	14,160	18,715	168	3.8	4.26	year-round
8275	160	640	5,500	6,300	26	2.5	6.89	year-round
8277	2,186	2,602	31,922	36,710	336	6	6.9	year-round
8281	640	968	6,377	7,985	149	8	4.30	year-round
8285	40	--	17,920	17,960	8	.2	5	year-round
8286	639	--	3,040	3,679	124	17.4	5.15	year-round
8297	880	800	5,400	7,080	227	12.4	3.88	year-round
8327	80	2,915	5,080	8,075	16	1	5	year-round
8331	40	--	1,440	1,480	10	2.7	4	year-round
8333	200	640	5,918	6,758	56	3.0	3.57	year-round
8334	320	680	10,402	11,402	80	2.8	4	year-round
8336	577	640	9,270	10,487	80	5.5	7.21	year-round
8350	120	640	5,320	6,080	24	2	5	spring
8353	1,401	640	5,225	7,266	300	19.3	4.67	summer-fall
8354	400	--	7,320	7,720	65	5.2	6.15	year-round
8369	1,175	640	11,000	12,815	177	9.2	6.64	year-round
8370	961	--	2,560	3,521	154	27.3	6.24	year-round
8372	640	--	1,520	2,160	178	29.6	3.50	year-round
8373	396	640	4,240	5,276	80	7.5	4.96	summer-fall
8384	81	--	1,120	1,201	22	6.8	3.70	year-round

TABLE 2--CONTINUED

GR #	Acres Leased P.L.	Acres State Land	Acres Private Land	Acres Total	AUMs on P. L.	% Federal Range	Acres Per AUM	Season of Use
8386	644	1,420	12,958	15,022	90	4.3	7.2	year-round
8396	40	1,280	800	2,210	14	1.9	2.86	year-round
8405	120	--	1,720	1,840	8	6.5	15	year-round
8422	40	--	8,566	8,606	12	.5	3.33	year-round
8034	160	--	720	880	20	18.2	8	year-round
8102	553	--	6,440	6,993	64	7.9	8.65	year-round
8131	920	1,158	17,922	20,000	212	4.6	4.34	year-round
8323	240	320	3,154	3,714	52	.6	4.60	year-round
8417	200	--	3,594	3,794	50	5.3	4	year-round
8419	40	--	1,240	1,280	11	3.1	3.64	winter

1/All C allotments are in fair to good condition, and are very hard to manage because of their scattered pattern.

APPENDIX 1

CATEGORIZATION CRITERIA

DISCUSSION OF FACTORS USED IN ALLOTMENT ANALYSIS

Factor A—Range Condition

Two principal sources of data will be utilized in documenting range condition and trend on the leases:

1. An assessment of the apparent range condition and trend, will be made by area personnel based on range condition indicators, MRB data previous documentation by BLM personnel, experience, and knowledge of the resource. SCS range data will also be used when available.
2. Operator input will be an important factor considered in evaluating range condition and trend.

Factor B—Evaluation of Present Management

The assessment of the present management situation will be addressed from the perspective of both the resource and the range user's needs. The two principal sources of data for the evaluation will be the resource area staff and the range user.

1. The range user and BLM personnel will draw on their experience and knowledge of the lease to identify areas which are *potentially suitable or seasonally suitable* for livestock grazing and to identity management problems such as over-used and under-used areas. The determination of percentage suitability will be made in accordance with BLM range suitability guidelines (IM 78-134). The operator will be relied on to identify management constraints such as predation, poisonous plants, weather, availability of water, access, etc. which affect the use and management of livestock on the lease.
2. BLM's evaluation of management practices on the lease will center on determination of whether the turnout dates, numbers, and periods of use are consistent with range readiness and sound range management principals.

Factor C—Resource Potential

Two principal sources for information will be utilized to evaluate the resource production potential of the leases.

1. A general evaluation of the production potential of the leases will be made using SCS soil survey maps and range site technical guides, and the MRB data. BLM personnel and the range user will draw on their knowledge of the resource and experience to determine whether the BLM lands are producing at or near their potential.
2. Areas characterized by excessive slope and/or low-forage production were identified as waste areas in the MRB Survey. This information will be utilized to make an initial determination of the percentage of land in the lease which is unsuitable for livestock grazing.

Factor D—Identification of Resource Conflicts/Controversy

Resource conflicts and controversy on the leases will be identified utilizing three sources of information.

1. It is expected that through the public participation process range users, the general public, and state and federal agencies will identify both broad and site specific resource conflicts on BLM land in the resource area.
2. BLM staff specialists will utilize their knowledge of the resource, experience, and professional judgment to identify grazing-related resource conflicts.

3. Resource conflicts in some areas may be identified as a result of previous planning efforts or analysis of resource monitoring studies.

Factor E—Determination of Potential for Positive Economic Return on Investments

The principal factor constraining the realization of a positive economic return on public investments is the amount and distribution of public land in the ranch unit. BLM personnel, together with the range user and other interested publics, will evaluate the allotment potential and plan management actions accordingly. Prior to initiation of management actions on the allotments, a benefit/cost analysis will be made. Results of the analysis will be used to support decisions regarding management actions on the allotment.

CATEGORIZATION CRITERIA

Category M—Maintain Existing Resource Conditions

The allotment analysis process shows the allotment in satisfactory condition and, for the most part, classified through the MFP process as an intensive management area.

Factor A

Range condition is satisfactory:

1. BLM and the operator have not been able to identify opportunities for improvement.
2. The range trend appears to be static or improving.

Factor B

Present management is adequate to maintain the allotment in a satisfactory condition.

1. No significant distribution problems exist.
    a. Grazing use is evenly distributed on the allotment.
    b. Less than 20% of the allotment is classified as potentially suitable for livestock grazing.
2. Period-of-use, kind, and numbers of livestock are adequate to meet the current management needs.
3. The range condition will improve, or can be maintained under current management practices.

Factor C

Allotment has a moderate or high resource production potential, and is producing to the satisfaction of BLM personnel and the operator.

Less than 30% of the allotment is rated as unsuitable for livestock grazing due to slope, topography, or low forage production.

Factor D

No significant grazing-related resource conflicts have been identified.

1. Forage production is adequate to meet the needs of all grazing animals on the allotment.
2. Livestock grazing does not conflict with other comsumptive and noncomsumptive resource values on the allotment.

Factor E

Opportunities may exist for positive return from public investments.

The public lands are blocked or intermingled with other lands and provide an opportunity for multiple-use management.

Management Actions

BLM's management objective will be to take or authorize actions that will maintain current balanced use and satisfactory resource condition and productivity.

Livestock use (numbers, class, season-of-use) will be permitted as authorized under a 10-year lease. Increases in use may be allowed when consistent with multiple-use objectives.

Prescribed flexibility in livestock operations through consultation will be encouraged.

Range improvements will be authorized to meet management objectives.

BLM will conduct low-to-high intensity monitoring depending on the value of all resources in the allotment.

Allotments will automatically be considered for a change in category when the grazing privileges are transferred or with significant changes in actual use or management.

APPENDIX 1

Principal Sources of Funding

Private investment in range improvements

Range betterment funds

Category I—Improve Existing Resource Conditions

Allotment classified as an intensive management area in the MFP and the allotment analysis identified a need for improving the existing resource conditions.

Factor A

Range condition is not satisfactory.

1. BLM personnel and the operator have identified opportunities for improvement.
2. The range trend appears to be static or downward.

Factor B

Present levels of management are not adequate to meet the long-term resource objectives.

1. Livestock distribution problems have been identified.
    a. Distribution of livestock use is not uniform. Portions of the allotment are overused while other areas receive very limited use.
    b. More than 20% of the allotment may be classified as potentially suitable for livestock grazing.
2. Period-of-use, forage utilization, and numbers of livestock appears not be meet current management needs.

Factor C

The allotment has a moderate-to-high resource production potential and is producing at low-to-moderate levels.

Less than 30% of the allotment is classified as unsuitable for livestock grazing due to slope, topography, or low forage production.

Factor D

Significant grazing-related resource-use conflicts have been identified on the allotment.

1. Forage production does not meet the needs of all grazing animals on the allotment. The present levels of livestock use and the management objective levels of other grazing animals cannot be accommodated.
2. Livestock grazing conflicts with other consumptive and nonsumptive resource values on the allotment.

Factor E

Opportunities exist for positive economic return on public investments.

The public lands are blocked or intermingled with other lands and provide an opportunity for multiple-use management.

Management Actions

BLM's immediate management objective will be to implement actions that will improve current range condition and productivity and enhance multiple use.

Livestock use may be increased or decreased as needed to meet management objectives.

Range improvements will be authorized and installed as needed to meet management objectives.

BLM will conduct variable (up to high) intensity use supervision and monitoring. Monitoring will evaluate the effectiveness of actions taken toward achieving management objectives.

Principal Sources of Funding

Private investment in range improvements

Range betterment funds

Funding appropriated under FLPMA and PRIA

Category C—Custodial Management

Allotments outside the intensive management areas where the allotment analysis revealed that federal multiple-use management opportunities are limited.

Factor A

Present range condition is not an allotment analysis factor.

Factor B

Present management is satisfactory, or is the only logical practice under existing resource and land ownership conditions.

Factor C

The allotment has a low production potential and is producing near its potential.

APPENDIX 1

Factor D

Significant resource conflicts are limited.

1. Livestock grazing does not conflict with other consumptive and non-consumptive resource uses on the allotment.
2. The allotment is not critical to any renewable resource program.

Factor E

Opportunities for positive economic return on public investment do not exist or are constrained by technological or economic factors.

The land ownership pattern is such that there is no opportunity for intensive management due to:

1. Land ownership pattern consisting of isolated noncontinguous tracts of federal land.
2. The Federal lands contribute only a small percentage of the total livestock forage used on the ranch unit.
3. Existing or imminent noncompatible land use.

Management Actions

BLM's short-term management objective would be to manage the land in a custodial manner by authorizing grazing use at the level needed to prevent deterioration of present resource conditions or development of multiple-use conflicts.

BLM will conduct low-intensity use supervision and monitoring. Monitoring will focus on changes in ownership or livestock operations.

Flexibility of turnout and removal dates and numbers of livestock will be prescribed through consultation.

Range improvements would be authorized to meet management objectives.

BLM would cooperate with SCS or other resource agencies to develop ranch plans on an allotment-by-allotment basis.

Principal Source of Funding

Private investment in range improvements

Range betterment funds

APPENDIX 2

BLM STANDARD OPERATING PROCEDURES

MONITORING

Any monitoring would be conducted in accordance with the following standard operating procedures:

1. The BLM Manual, Section 4430.56, would be used as a general guide in developing trend-monitoring procedures. Plant frequency and ground cover would be sampled to evaluate vegetation and soil trend. Other parameters, such as canopy, seedling, or shrub characteristics would be considered on unique areas such as riparian zones, aspen stands, and bitterbrush and mahogany thickets.
2. During and after grazing of each pasture, forage utilization would be measured by the key forage plant method described in the BLM Manual, Section 4430.47. This would aid in determining whether stocking levels were providing proper use and what adjustments, if any, would be needed. These studies would also help determine a schedule for seasonal use.
3. Meadows would be monitored to determine impacts from livestock grazing activities.
4. Rain gauges would be used to take measurements of precipitation to help interpret vegetation production variations resulting from climatic changes.
5. Water quality and quantity would be monitored as necessary to determine problem areas.
6. Soil movement would be assessed in conjunction with trend and utilization studies. Changes in gully development along transects would be documented. Clay-mineral analysis of sediment would be used to monitor changes in sediment and erosion sources.

GRAZING ADMINISTRATION

Any grazing administration that would occur under the Proposed Action or alternatives would be conducted in accordance with the following standard operating procedures:

1. Permits specifying the season of use and number and kind of livestock would be issued to each operator. Operators would have to obtain BLM approval prior to changing the grazing specifications outlined in their permits.
2. Livestock operators would file actual-use reports showing how many and how long cattle grazed in each pasture. Use on the allotments would be supervised by BLM throughout the grazing year.
3. Trespass actions would be initiated for any allotment grazed outside the limits described in the permit. The trespass would be eliminated and payment retrieved from those responsible for damage and consumption of forage.
4. Each AMP would incorporate site-specific objectives for maintaining or improving wildlife and fish habitat within the allotment. The grazing system implemented under the AMP would be designed to achieve those objectives.

RANGE IMPROVEMENTS

Any range improvements that would occur under the Proposed Action or alternatives would be conducted in accordance with the following standard operating procedures.

General

1. Before construction of range developments and vegetative manipulations, cultural resources would be inventoried and evaluated, and attempts to avoid sites of significant cultural resources and high site density areas would be made. If this was not possible, consultation would be made with the State Historic Preservation Officer and the Advisory Council on Historic Preservation to develop acceptable mitigative strategies. Locations of cultural sites would not be disclosed to the public.
2. Site-specific endangered species inventories would be completed before any project is implemented. Endangered Species Act, Section 7 consultations would be conducted, if deemed necessary.

3. In accordance with the BLM Manual, Section 8341, visual resource management contrast ratings would be used in the project planning stages of all proposed land management activites that would disturb the soil, change or remove vegetation, or place a structure on the landscape. These ratings would be used to determine the amount of contrast between a proposed activity andthe existing landscape. Assessing the amount of contrast would indicate the severity of impact and serve as a guide in determining what would be required to reduce the contrast (visual impact) to the point where it would meet the visual management class requirements for the area where the project would be located.
4. Cooperative agreements with range users would outline maintenance responsibilities for range improvement projects.

Fences

1. Fences would be installed according to spacing, height, and other specifications described in the BLM Manual, Section 1737.
2. No more than 0.5 acres per mile would be disturbed during fence construction, and fence lines would not be bladed or scraped.
3. Construction of fences in wildlife use areas would meet BLM specifications to permit the movement of identified wildlife species, and pole-top fence would be used to avoid injury to elk.
4. Cattleguards, instead of gates, would be located where fences cross roads. Generally, cattleguards would be 8-feet wide and 12-feet long.

Water Developments

1. Livestock watering developments would be available and designed to be safe for identified wildlife needs.
2. After the excavation of a spring, a metal headbox would be installed. The water would be piped into a trough with an overflow pipe leading back into the original drainage or into a new pit. The meadow complex around the spring would be fenced.
3. All water troughs be either 18-foot circular rings with concrete bases or 3-foot x 12-foot metal troughs. Wildlife escape ramps would be installed to prevent birds and small animals from drowning.
4. Windmills would be drilled and cased, the pump facilities placed, and if desired, a storage tank installed. No more than 0.05 acres per windmill would be disturbed.
5. After excavation of a reservoir, the dike, which would contain a spillway, would be placed. Reservoirs would have an average capacity of 1 acre foot.

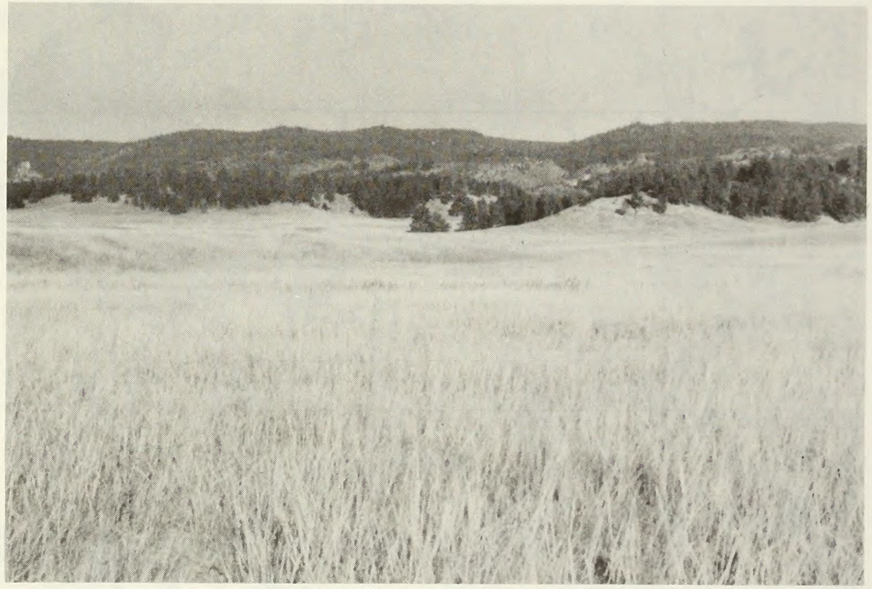
APPENDIX 3

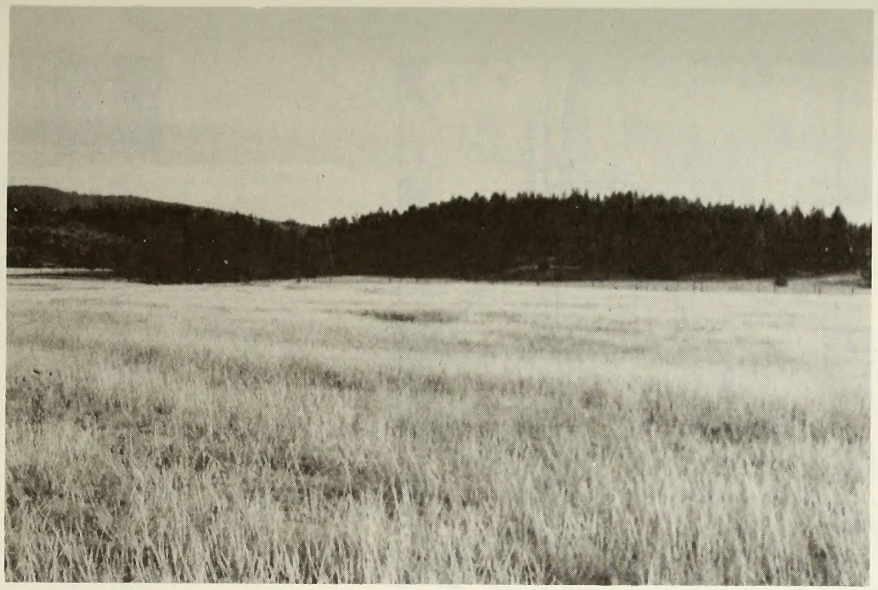
STRATEGIC BIG GAME LEVELS[1]

Deer	67,500
Antelope	23,000
Elk	300

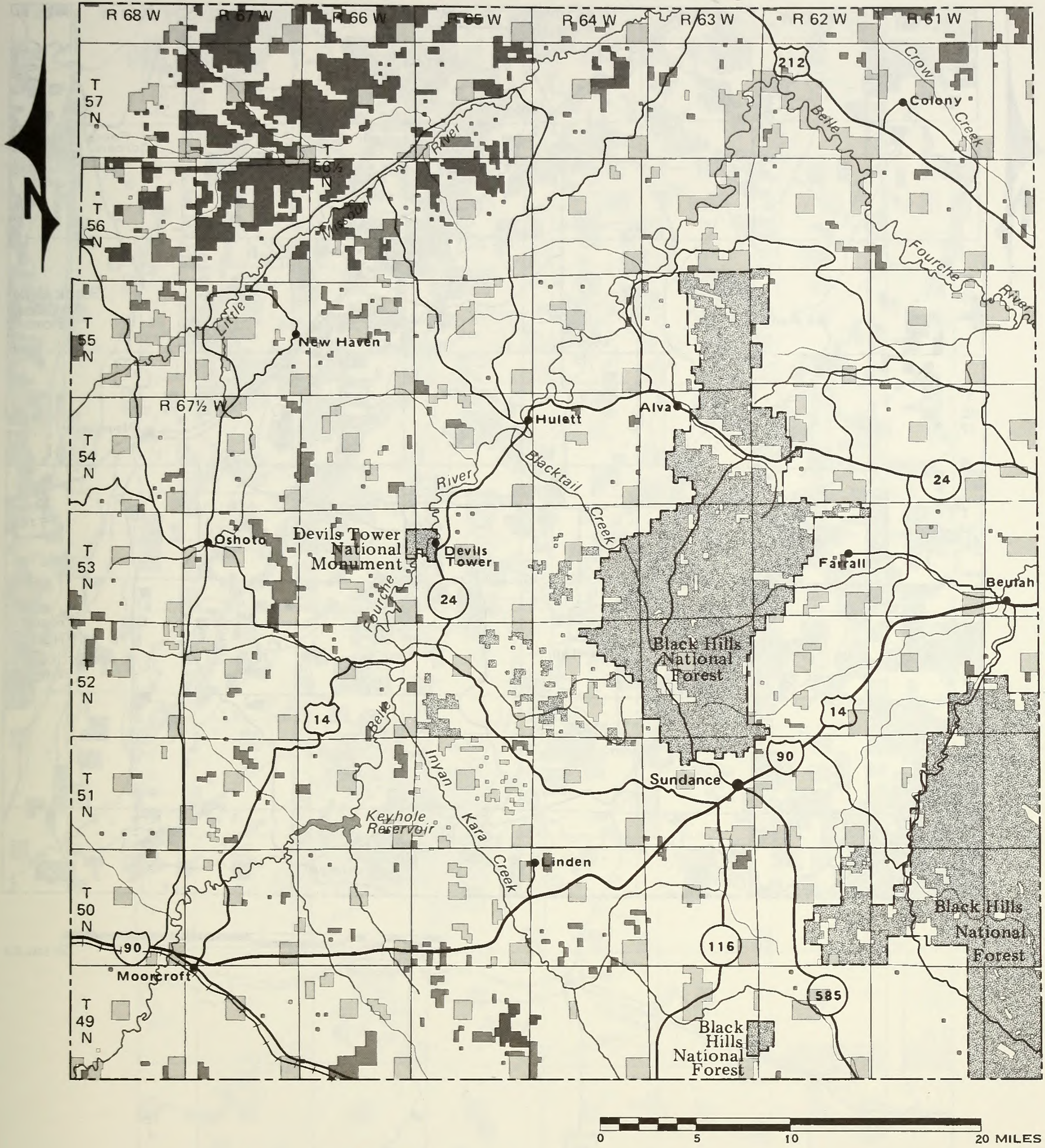
[1] These figures represent objectives for big game levels in the Newcastle Resource Area from the revised Wyoming Game and Fish Department's Strategic plan. According to Game and Fish personnel, big game levels are now at or above these objectives.

PHOTOGRAPHS OF THE NEWCASTLE AREA





Surface Ownership and Grazing Allotment Categories–Crook County



▨ National Forest Service

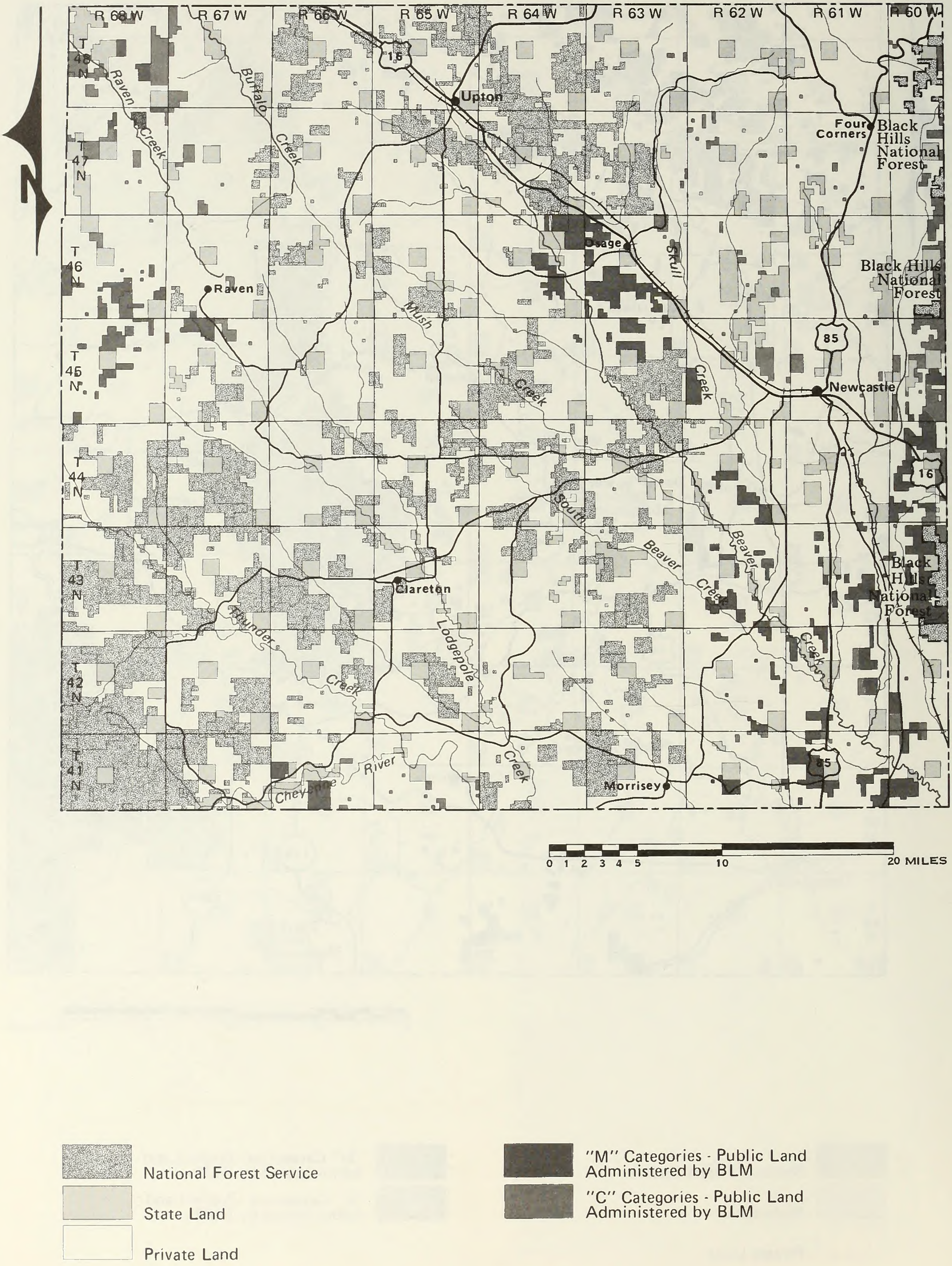
▨ State Land

☐ Private Land

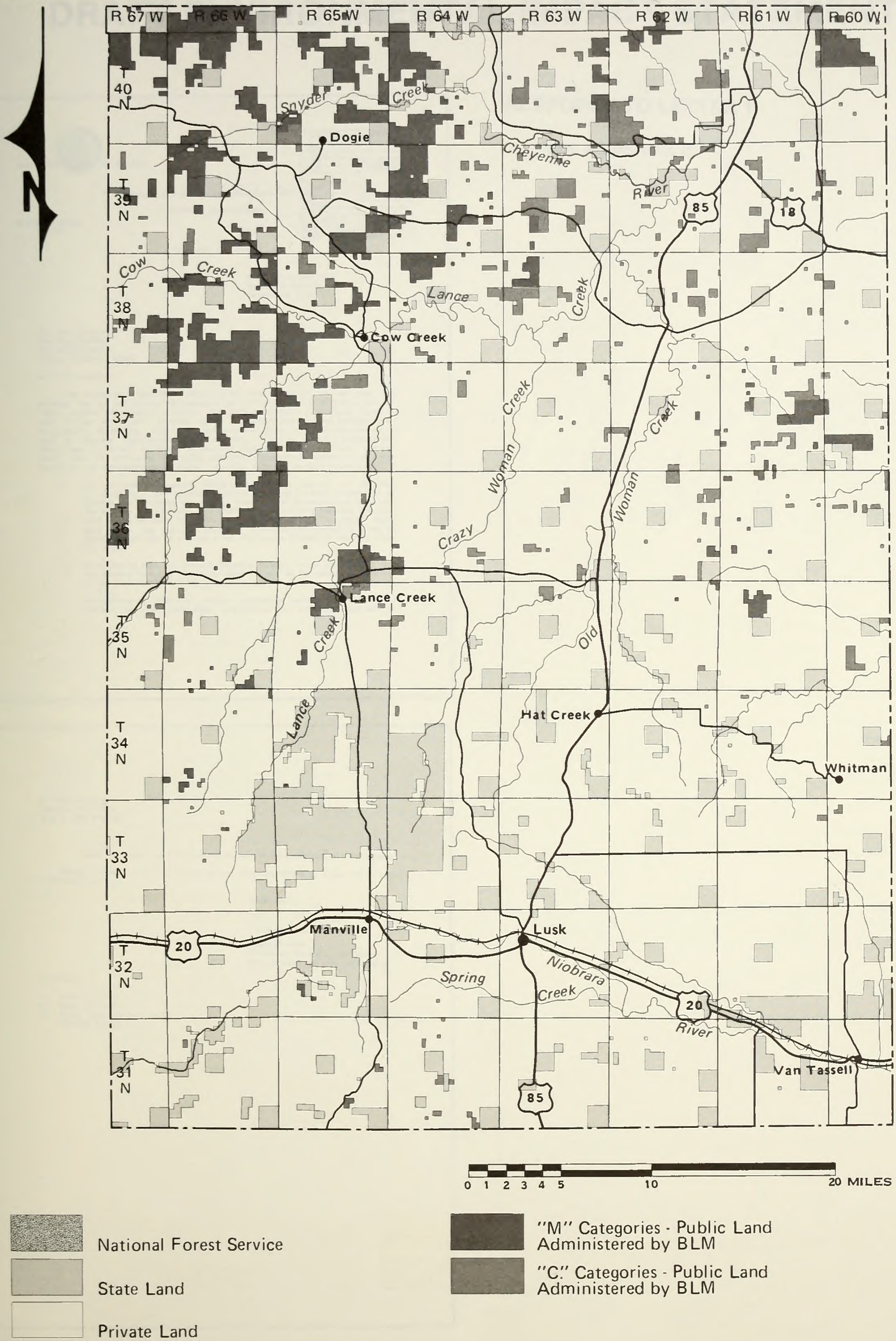
■ "M" Categories - Public Land Administered by BLM

▨ "C" Categories - Public Land Administered by BLM

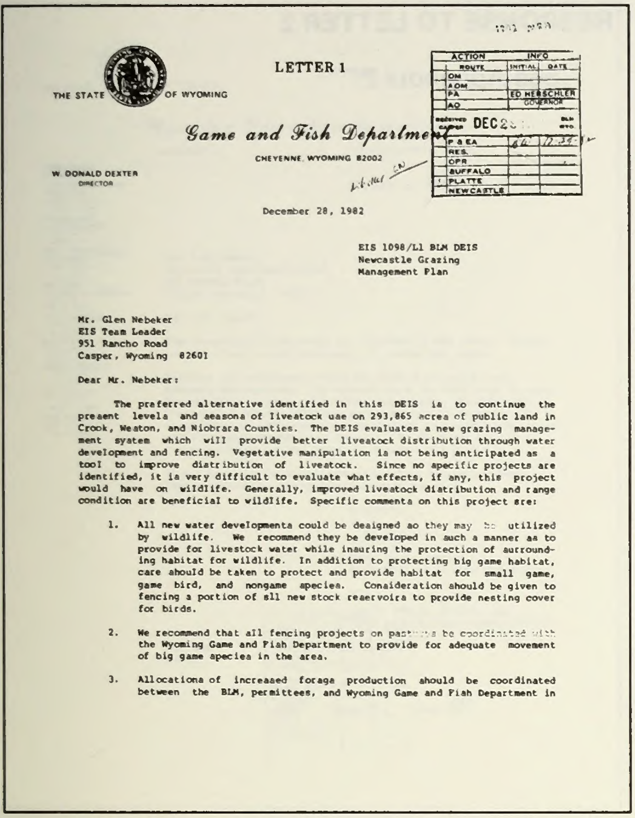
Surface Ownership and Grazing Allotment Categories–Weston County



Surface Ownership and Grazing Allotment Categories–Niobrara County



PUBLIC COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT



LETTER 1

THE STATE OF WYOMING

Game and Fish Department

CHEYENNE, WYOMING 82002

W. DONALD DEXTER
DIRECTOR

ACTION	ROUTE	INFO INITIAL	DATE
	OM		
	AOM		
	PA	ED HERSCHLER GOVERNOR	
	AO		
RECEIVED CASPER	DEC 2		BLM WYO
	P & EA		12-29
	RES.		
	OPR		
	BUFFALO		
1	PLATTE		
	NEWCASTLE		

December 28, 1982

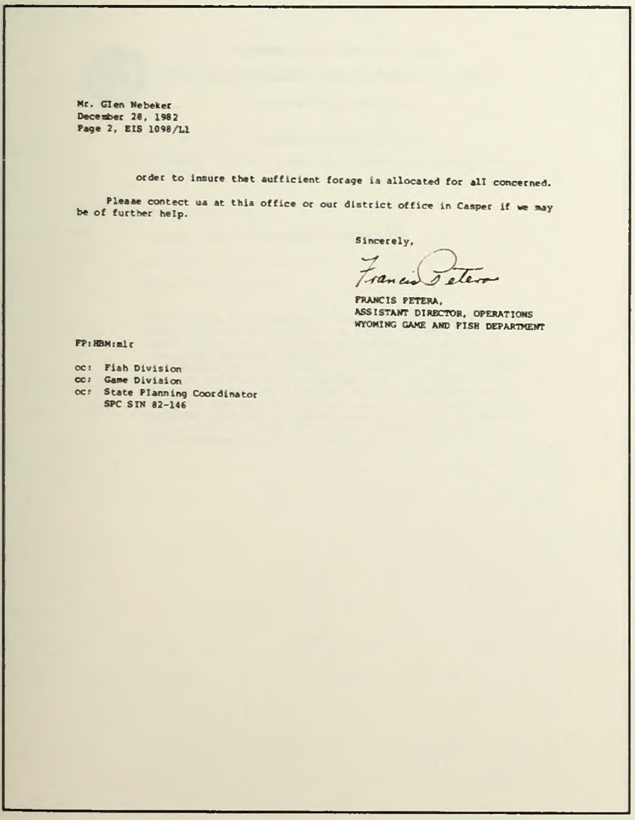
EIS 1098/L1 BLM DEIS
Newcastle Grazing
Management Plan

Mr. Glen Nebeker
EIS Team Leader
951 Rancho Road
Casper, Wyoming 82601

Dear Mr. Nebeker:

The preferred alternative identified in this DEIS is to continue the present levels and seasons of livestock use on 293,865 acres of public land in Crook, Weston, and Niobrara Counties. The DEIS evaluates a new grazing management system which will provide better livestock distribution through water development and fencing. Vegetative manipulation is not being anticipated as a tool to improve distribution of livestock. Since no specific projects are identified, it is very difficult to evaluate what effects, if any, this project would have on wildlife. Generally, improved livestock distribution and range condition are beneficial to wildlife. Specific comments on this project are:

1. All new water developments could be designed so they may be utilized by wildlife. We recommend they be developed in such a manner as to provide for livestock water while insuring the protection of surrounding habitat for wildlife. In addition to protecting big game habitat, care should be taken to protect and provide habitat for small game, game bird, and nongame species. Consideration should be given to fencing a portion of all new stock reservoirs to provide nesting cover for birds.
2. We recommend that all fencing projects on pastures be coordinated with the Wyoming Game and Fish Department to provide for adequate movement of big game species in the area.
3. Allocations of increased forage production should be coordinated between the BLM, permittees, and Wyoming Game and Fish Department in



Mr. Glen Nebeker
December 28, 1982
Page 2, EIS 1098/L1

order to insure that sufficient forage is allocated for all concerned.

Please contact us at this office or our district office in Casper if we may be of further help.

Sincerely,

Francis Petera

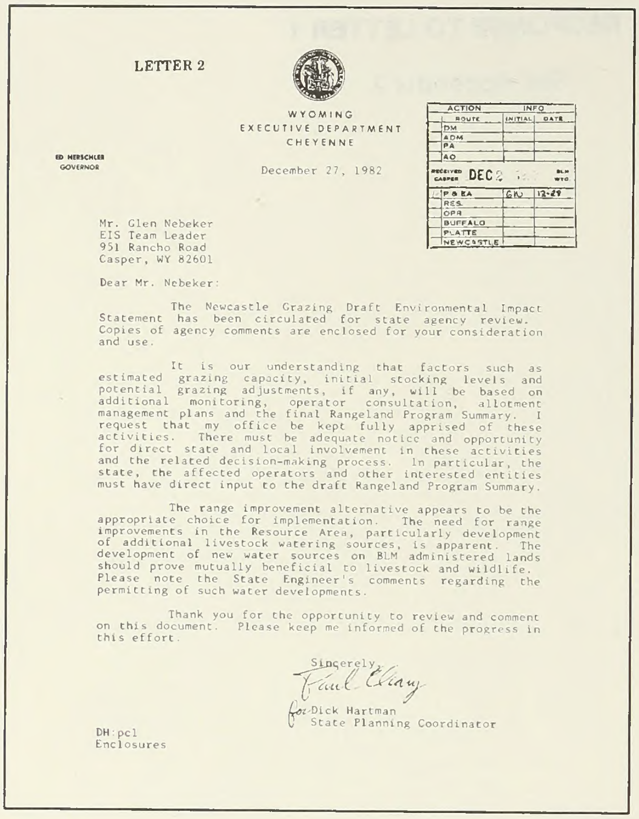
FRANCIS PETERA,
ASSISTANT DIRECTOR, OPERATIONS
WYOMING GAME AND FISH DEPARTMENT

FP:HBM:mlr

cc: Fish Division
cc: Game Division
cc: State Planning Coordinator
SPC SIN 82-146

RESPONSE TO LETTER 1

See Appendix 2



LETTER 2

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

ED HERSCHLER
GOVERNOR

December 27, 1982

ACTION	ROUTE	INITIAL	DATE
	DM		
	ADM		
	PA		
	AO		
RECEIVED CASPER	DEC 2		BLM WYO.
✓	P & EA	GKJ	12-29
	RES.		
	OPR		
	BUFFALO		
	PLATTE		
	NEWCASTLE		

Mr. Glen Nebeker
EIS Team Leader
951 Rancho Road
Casper, WY 82601

Dear Mr. Nebeker:

The Newcastle Grazing Draft Environmental Impact Statement has been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use.

It is our understanding that factors such as estimated grazing capacity, initial stocking levels and potential grazing adjustments, if any, will be based on additional monitoring, operator consultation, allotment management plans and the final Rangeland Program Summary. I request that my office be kept fully apprised of these activities. There must be adequate notice and opportunity for direct state and local involvement in these activities and the related decision-making process. In particular, the state, the affected operators and other interested entities must have direct input to the draft Rangeland Program Summary.

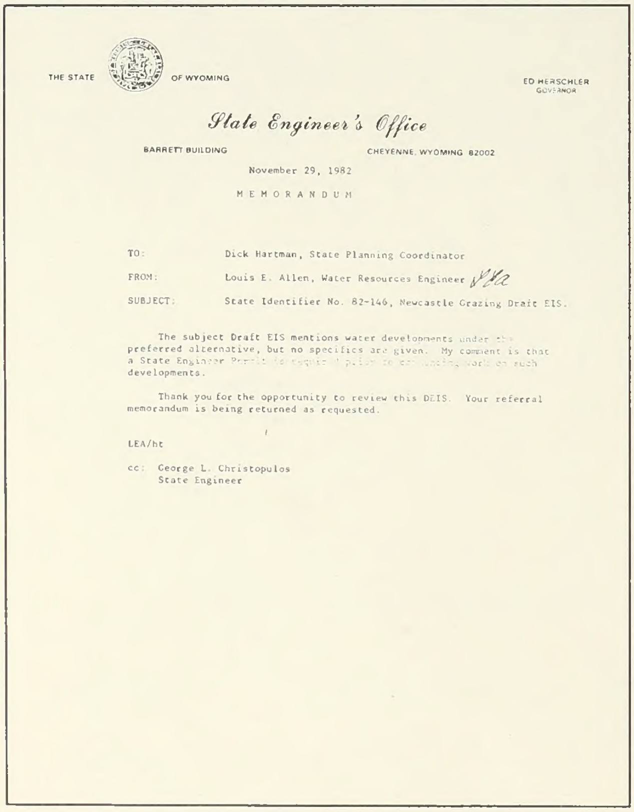
The range improvement alternative appears to be the appropriate choice for implementation. The need for range improvements in the Resource Area, particularly development of additional livestock watering sources, is apparent. The development of new water sources on BLM administered lands should prove mutually beneficial to livestock and wildlife. Please note the State Engineer's comments regarding the permitting of such water developments.

Thank you for the opportunity to review and comment on this document. Please keep me informed of the progress in this effort.

Sincerely,

Paul Cleary
for Dick Hartman
State Planning Coordinator

DH:pcl
Enclosures



THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

State Engineer's Office

BARRETT BUILDING CHEYENNE, WYOMING 82002

November 29, 1982

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator

FROM: Louis E. Allen, Water Resources Engineer LEA

SUBJECT: State Identifier No. 82-146, Newcastle Grazing Draft EIS.

The subject Draft EIS mentions water developments under the preferred alternative, but no specifics are given. My comment is that a State Engineer Permit is required prior to commencing work on such developments.

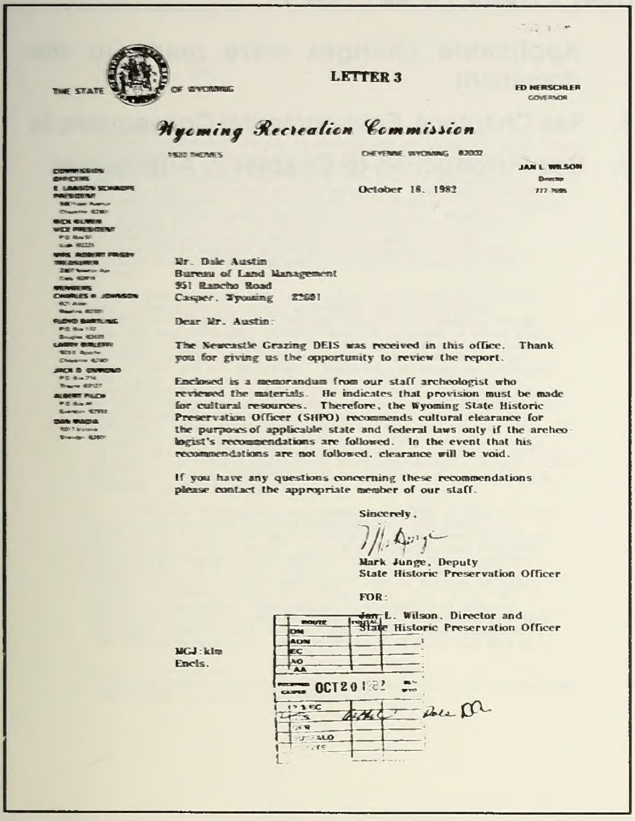
Thank you for the opportunity to review this DEIS. Your referral memorandum is being returned as requested.

LEA/ht

cc: George L. Christopulos
State Engineer

RESPONSE TO LETTER 2

See Appendix 2



THE STATE OF WYOMING

LETTER 3

ED HERSCHLER
GOVERNOR

Wyoming Recreation Commission

1920 THOMES CHEYENNE, WYOMING 82002

JAN L. WILSON
Director
777-7695

October 18, 1982

Mr. Dale Austin
Bureau of Land Management
951 Rancho Road
Casper, Wyoming 82601

Dear Mr. Austin:

The Newcastle Grazing DEIS was received in this office. Thank you for giving us the opportunity to review the report.

Enclosed is a memorandum from our staff archeologist who reviewed the materials. He indicates that provision must be made for cultural resources. Therefore, the Wyoming State Historic Preservation Officer (SHPO) recommends cultural clearance for the purposes of applicable state and federal laws only if the archeologist's recommendations are followed. In the event that his recommendations are not followed, clearance will be void.

If you have any questions concerning these recommendations please contact the appropriate member of our staff.

Sincerely,

Mark Junge, Deputy
State Historic Preservation Officer

FOR:

Jan L. Wilson, Director and
State Historic Preservation Officer

MGJ:klm
Encls.

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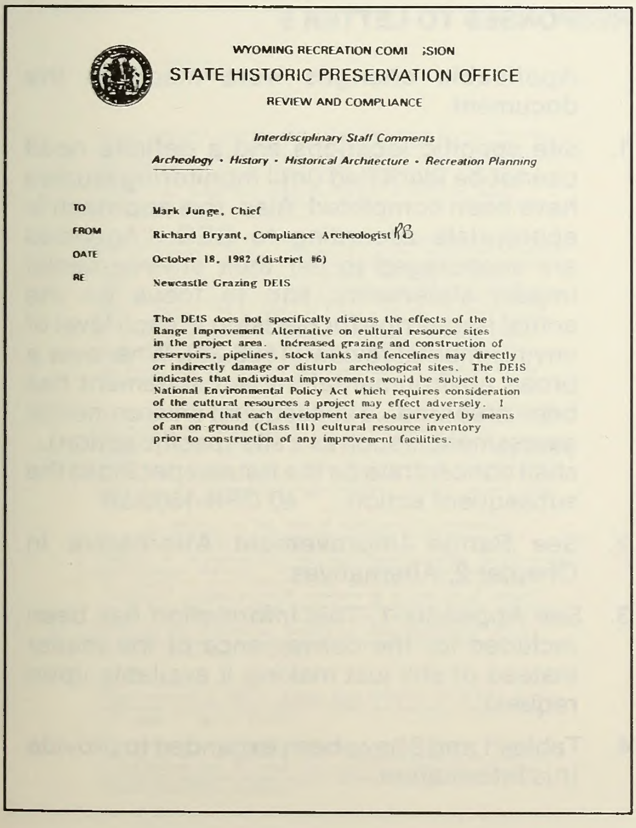
BUFFALO

Dale



WYOMING RECREATION COMMISSION

STATE HISTORIC PRESERVATION OFFICE

REVIEW AND COMPLIANCE

Interdisciplinary Staff Comments

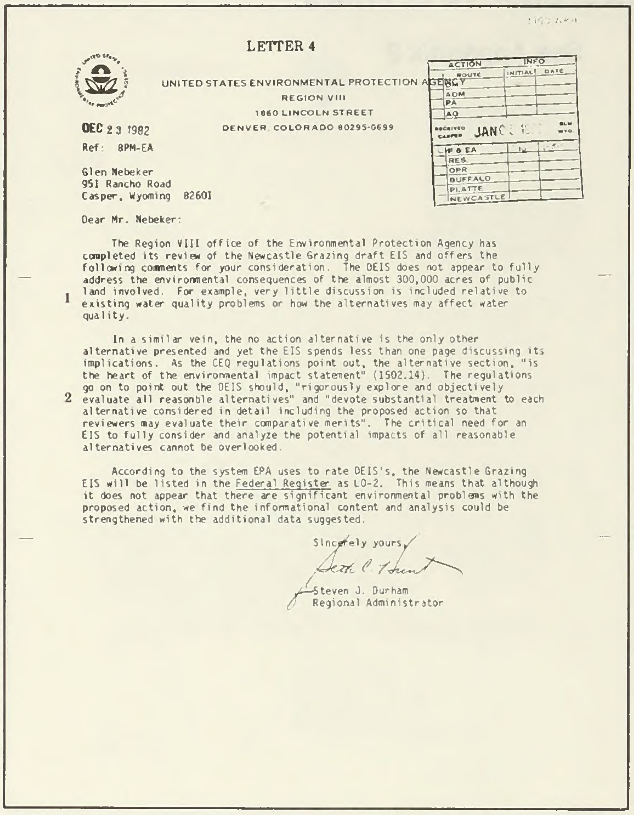
Archeology • History • Historical Architecture • Recreation Planning

TO Mark Junge, Chief
FROM Richard Bryant, Compliance Archeologist RB
DATE October 18, 1982 (district #6)
RE Newcastle Grazing DEIS

The DEIS does not specifically discuss the effects of the Range Improvement Alternative on cultural resource sites in the project area. Increased grazing and construction of reservoirs, pipelines, stock tanks and fencelines may directly or indirectly damage or disturb archeological sites. The DEIS indicates that individual improvements would be subject to the National Environmental Policy Act which requires consideration of the cultural resources a project may effect adversely. I recommend that each development area be surveyed by means of an on-ground (Class III) cultural resource inventory prior to construction of any improvement facilities.

RESPONSE TO LETTER 3

See Appendix 2



LETTER 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

ACTION INFO
ROUTE INITIAL DATE
OM
ADM
PA
AO
RECEIVED CASPER JAN BLM WYO
P & EA
RES
OPR
BUFFALO
PLATTE
NEWCASTLE

DEC 23 1982

Ref: 8PM-EA

Glen Nebeker
951 Rancho Road
Casper, Wyoming 82601

Dear Mr. Nebeker:

The Region VIII office of the Environmental Protection Agency has completed its review of the Newcastle Grazing draft EIS and offers the following comments for your consideration. The DEIS does not appear to fully address the environmental consequences of the almost 300,000 acres of public land involved. For example, very little discussion is included relative to existing water quality problems or how the alternatives may affect water quality. 1

In a similar vein, the no action alternative is the only other alternative presented and yet the EIS spends less than one page discussing its implications. As the CEQ regulations point out, the alternative section, "is the heart of the environmental impact statement" (1502.14). The regulations go on to point out the DEIS should, "rigorously explore and objectively evaluate all reasonble alternatives" and "devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits". The critical need for an EIS to fully consider and analyze the potential impacts of all reasonable alternatives cannot be overlooked. 2

According to the system EPA uses to rate DEIS's, the Newcastle Grazing EIS will be listed in the Federal Register as LO-2. This means that although it does not appear that there are significant environmental problems with the proposed action, we find the informational content and analysis could be strengthened with the additional data suggested.

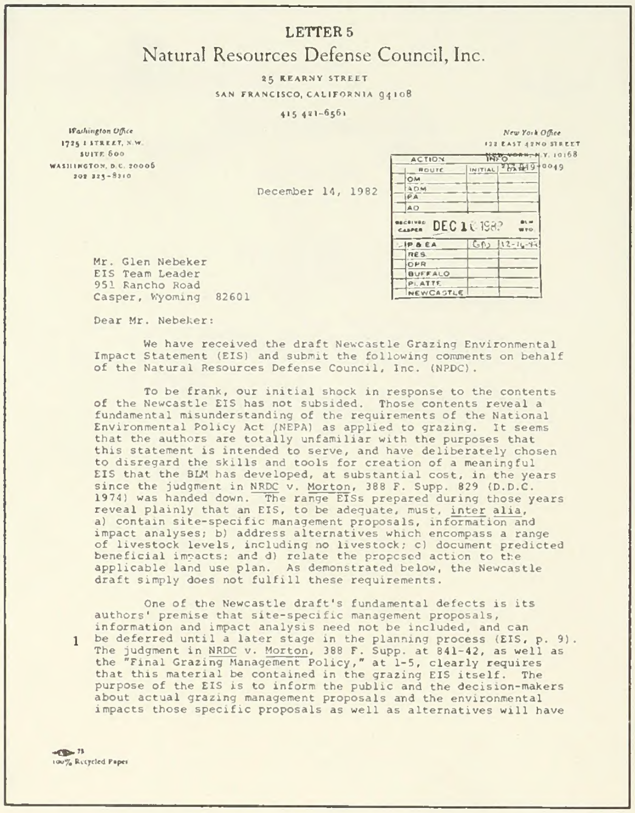
Sincerely yours,

Steven J. Durham
Regional Administrator

RESPONSES TO LETTER 4

Applicable changes were made in the document

1. See Chapter 4, Environmental Consequences
2. See Introduction to Chapter 2, Alternatives



LETTER 5

Natural Resources Defense Council, Inc.
25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

Washington Office
1725 I STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006
202 223-8210

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

ACTION INFO
ROUTE INITIAL DATE
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ADM
PA
AO
RECEIVED CASPER DEC 1 1982 BLM WYO
P & EA GN 12-16-82
RES
OPR
BUFFALO
PLATTE
NEWCASTLE

December 14, 1982

Mr. Glen Nebeker
EIS Team Leader
951 Rancho Road
Casper, Wyoming 82601

Dear Mr. Nebeker:

We have received the draft Newcastle Grazing Environmental Impact Statement (EIS) and submit the following comments on behalf of the Natural Resources Defense Council, Inc. (NPDC).

To be frank, our initial shock in response to the contents of the Newcastle EIS has not subsided. Those contents reveal a fundamental misunderstanding of the requirements of the National Environmental Policy Act (NEPA) as applied to grazing. It seems that the authors are totally unfamiliar with the purposes that this statement is intended to serve, and have deliberately chosen to disregard the skills and tools for creation of a meaningful EIS that the BLM has developed, at substantial cost, in the years since the judgment in NRDC v. Morton, 388 F. Supp. 829 (D.D.C. 1974) was handed down. The range EISs prepared during those years reveal plainly that an EIS, to be adequate, must, inter alia, a) contain site-specific management proposals, information and impact analyses; b) address alternatives which encompass a range of livestock levels, including no livestock; c) document predicted beneficial impacts; and d) relate the proposed action to the applicable land use plan. As demonstrated below, the Newcastle draft simply does not fulfill these requirements.

One of the Newcastle draft's fundamental defects is its authors' premise that site-specific management proposals, information and impact analysis need not be included, and can be deferred until a later stage in the planning process (EIS, p. 9). The judgment in NRDC v. Morton, 388 F. Supp. at 841-42, as well as the "Final Grazing Management Policy," at 1-5, clearly requires that this material be contained in the grazing EIS itself. The purpose of the EIS is to inform the public and the decision-makers about actual grazing management proposals and the environmental impacts those specific proposals as well as alternatives will have 1

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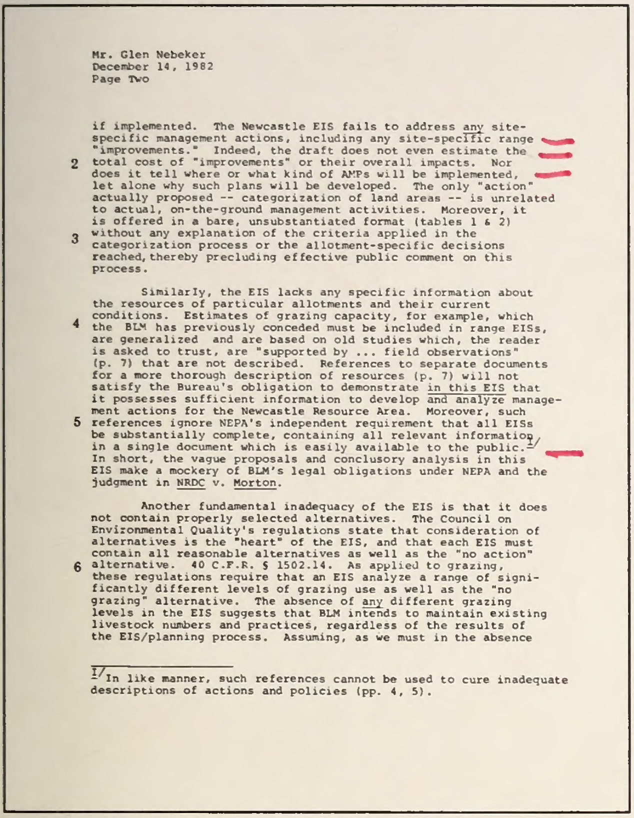
RESPONSES TO LETTER 5

Applicable changes were made in the document

1. Site specific locations and a definite need cannot be identified until monitoring studies have been completed. Also, this approach is appropriate according to CEQ. "Agencies are encouraged to tier their environmental impact statements...and to focus on the actual issues ripe for decision at each level of environmental review (1508.28). Whenever a broad environmental impact statement has been prepared...a subsequent environmental assessment...(such as a site specific action)... shall concentrate on the issues specific to the subsequent action...." 40 CFR 1502.20
2. See Range Improvement Alternative in Chapter 2, Alternatives.
3. See Appendix 1. This information has been included for the convenience of the reader instead of still just making it available upon request.
4. Tables 1 and 2 have been expanded to provide this information.



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if implemented. The Newcastle EIS fails to address any site-
specific management actions, including any site-specific range
"improvements." Indeed, the draft does not even estimate the
2 total cost of "improvements" or their overall impacts. Nor
does it tell where or what kind of AMPs will be implemented,
let alone why such plans will be developed. The only "action"
actually proposed -- categorization of land areas -- is unrelated
to actual, on-the-ground management activities. Moreover, it
is offered in a bare, unsubstantiated format (tables 1 & 2)
3 without any explanation of the criteria applied in the
categorization process or the allotment-specific decisions
reached, thereby precluding effective public comment on this
process.

Similarly, the EIS lacks any specific information about
the resources of particular allotments and their current
conditions. Estimates of grazing capacity, for example, which
4 the BLM has previously conceded must be included in range EISs,
are generalized and are based on old studies which, the reader
is asked to trust, are "supported by ... field observations"
(p. 7) that are not described. References to separate documents
for a more thorough description of resources (p. 7) will not
satisfy the Bureau's obligation to demonstrate in this EIS that
it possesses sufficient information to develop and analyze manage-
ment actions for the Newcastle Resource Area. Moreover, such
5 references ignore NEPA's independent requirement that all EISs
be substantially complete, containing all relevant information
in a single document which is easily available to the public.[1]
In short, the vague proposals and conclusory analysis in this
EIS make a mockery of BLM's legal obligations under NEPA and the
judgment in NRDC v. Morton.

Another fundamental inadequacy of the EIS is that it does
not contain properly selected alternatives. The Council on
Environmental Quality's regulations state that consideration of
alternatives is the "heart" of the EIS, and that each EIS must
contain all reasonable alternatives as well as the "no action"
6 alternative. 40 C.F.R. § 1502.14. As applied to grazing,
these regulations require that an EIS analyze a range of signi-
ficantly different levels of grazing use as well as the "no
grazing" alternative. The absence of any different grazing
levels in the EIS suggests that BLM intends to maintain existing
livestock numbers and practices, regardless of the results of
the EIS/planning process. Assuming, as we must in the absence

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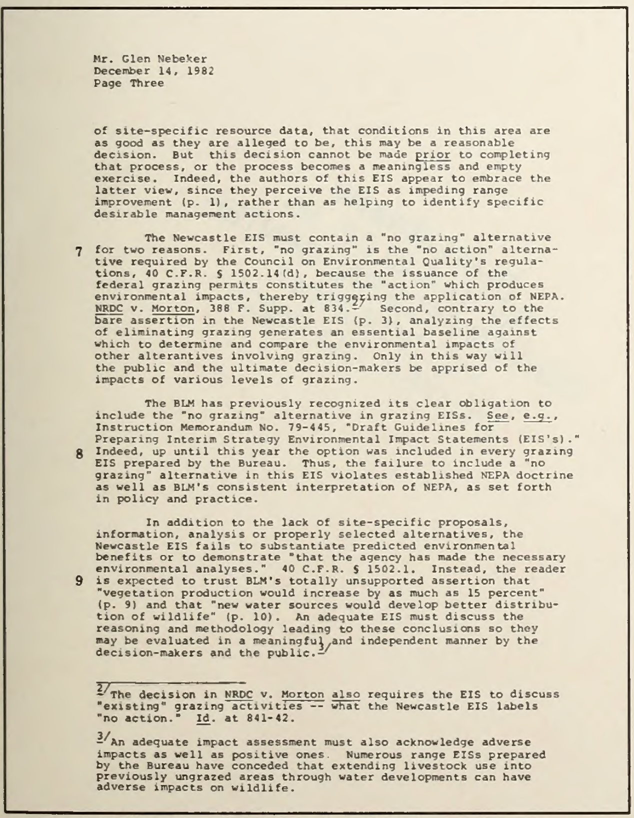
[1] In like manner, such references cannot be used to cure inadequate descriptions of actions and policies (pp. 4, 5).



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of site-specific resource data, that conditions in this area are
as good as they are alleged to be, this may be a reasonable
decision. But this decision cannot be made prior to completing
that process, or the process becomes a meaningless and empty
exercise. Indeed, the authors of this EIS appear to embrace the
latter view, since they perceive the EIS as impeding range
improvement (p. 1), rather than as helping to identify specific
desirable management actions.

The Newcastle EIS must contain a "no grazing" alternative
7 for two reasons. First, "no grazing" is the "no action" alterna-
tive required by the Council on Environmental Quality's regula-
tions, 40 C.F.R. § 1502.14(d), because the issuance of the
federal grazing permits constitutes the "action" which produces
environmental impacts, thereby triggering the application of NEPA.
NRDC v. Morton, 388 F. Supp. at 834.[2] Second, contrary to the
bare assertion in the Newcastle EIS (p. 3), analyzing the effects
of eliminating grazing generates an essential baseline against
which to determine and compare the environmental impacts of
other alterantives involving grazing. Only in this way will
the public and the ultimate decision-makers be apprised of the
impacts of various levels of grazing.

The BLM has previously recognized its clear obligation to
include the "no grazing" alternative in grazing EISs. See, e.g.,
Instruction Memorandum No. 79-445, "Draft Guidelines for
Preparing Interim Strategy Environmental Impact Statements (EIS's)."
8 Indeed, up until this year the option was included in every grazing
EIS prepared by the Bureau. Thus, the failure to include a "no
grazing" alternative in this EIS violates established NEPA doctrine
as well as BLM's consistent interpretation of NEPA, as set forth
in policy and practice.

In addition to the lack of site-specific proposals,
information, analysis or properly selected alternatives, the
Newcastle EIS fails to substantiate predicted environmental
benefits or to demonstrate "that the agency has made the necessary
environmental analyses." 40 C.F.R. § 1502.1. Instead, the reader
9 is expected to trust BLM's totally unsupported assertion that
"vegetation production would increase by as much as 15 percent"
(p. 9) and that "new water sources would develop better distribu-
tion of wildlife" (p. 10). An adequate EIS must discuss the
reasoning and methodology leading to these conclusions so they
may be evaluated in a meaningful and independent manner by the
decision-makers and the public.[3]

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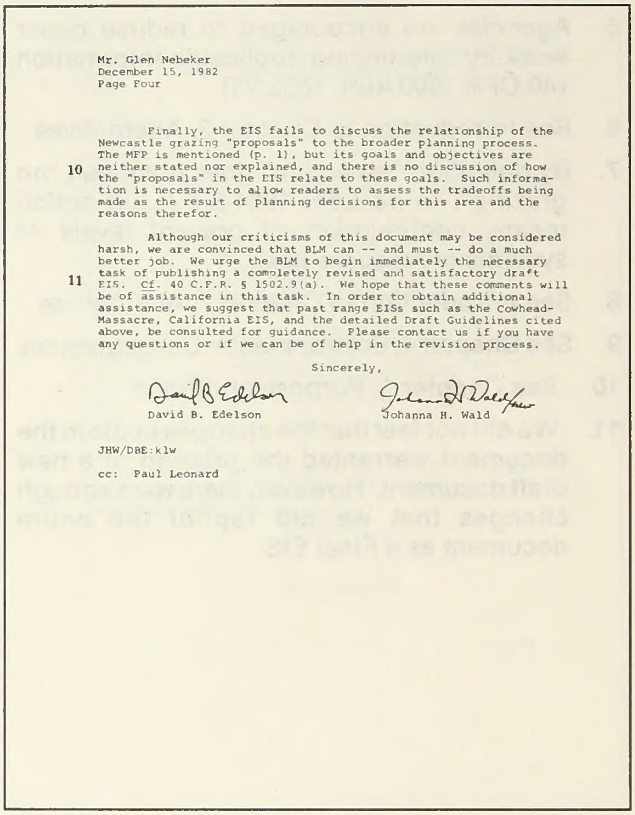
[2] The decision in NRDC v. Morton also requires the EIS to discuss "existing" grazing activities -- what the Newcastle EIS labels "no action." Id. at 841-42.

[3] An adequate impact assessment must also acknowledge adverse impacts as well as positive ones. Numerous range EISs prepared by the Bureau have conceded that extending livestock use into previously ungrazed areas through water developments can have adverse impacts on wildlife.

5. Agencies are encouraged to reduce paper work by referencing applicable information (40 CFR 1500.4(J); 1502.21).
6. See Introduction to Chapter 2, Alternatives
7. By definition "no action" does not mean "no grazing". In 43 CFR 1601.5-5 "...no action means continuation of present levels or systems of resource use...."
8. See Introduction to Chapter 2, Alternatives
9. See Chapter 4, Environmental Consequences
10. See Chapter 1, Purpose and Need
11. We did not feel that the changes made in the document warranted the printing of a new draft document. However, there were enough changes that we did reprint the entire document as a Final EIS.



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10 Finally, the EIS fails to discuss the relationship of the Newcastle grazing "proposals" to the broader planning process. The MFP is mentioned (p. 1), but its goals and objectives are neither stated nor explained, and there is no discussion of how the "proposals" in the EIS relate to these goals. Such information is necessary to allow readers to assess the tradeoffs being made as the result of planning decisions for this area and the reasons therefor.

11 Although our criticisms of this document may be considered harsh, we are convinced that BLM can -- and must -- do a much better job. We urge the BLM to begin immediately the necessary task of publishing a completely revised and satisfactory draft EIS. Cf. 40 C.F.R. § 1502.9(a). We hope that these comments will be of assistance in this task. In order to obtain additional assistance, we suggest that past range EISs such as the Cowhead-Massacre, California EIS, and the detailed Draft Guidelines cited above, be consulted for guidance. Please contact us if you have any questions or if we can be of help in the revision process.

Sincerely,

David B Edelson
David B. Edelson

Johanna H Wald
Johanna H. Wald

JHW/DBE:klw

cc: Paul Leonard

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